



Pt. 5



**U.S. Army Corps
of Engineers**

**United States Environmental Protection Agency, Region III
Corrective Action Program**

Environmental Indicator Inspection Report

for

**Kiwi Brands Inc.
Douglassville, Pennsylvania
EPA ID# PAD097153399**

Prepared By

**United States Army Corps of Engineers
Philadelphia District**

December 1, 1998

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**RCRA SITE INSPECTION REPORT
KIWI BRANDS, INC.
10 SEPTEMBER 1998**

Purpose: To gather relevant information from high priority RCRA facilities to determine whether or not human exposures and groundwater releases are controlled.

Documentation Review: On Wednesday, September 9, 1998 an extensive record search took place at the USEPA Regional office located on Arch Street in Philadelphia. The file search included the review of various documents for RCRA permit applications, historical spills and releases, closure documents, correspondences between USEPA, PADER and Kiwi Brands and documentation of previous environmental investigations or studies. Documents obtained during the facility file review and site inspection are presented in Appendix B.

Meeting Summary: The environmental indicator inspection commenced at 10:00 a.m. on Thursday, September 10, 1998. Dr. Mellinger presented an overview of Kiwi's manufacturing activities and processes, and an overview of the company's history at the site. The presentation included a description of the Solid Waste Management Units (SWMUs) located at the facility, the RCRA permit application history for the facility, and hazardous waste generation and management practices. Upon completion of the meeting the inspection of the facility commenced. Pictures contained in Attachment 2 were taken the day of the site inspection.

Attendees:

<u>Name</u>	<u>Agency/Company</u>	<u>Phone #</u>
Linda Matyskiela	EPA	215-814-3420
Susan Werner	PADEP	610-916-0100
Dr. Michael Mellinger	Kiwi Brands	610-385-9246
Chris Brown	USACE	215-656-6700
Scott Evans	USACE	215-656-6784
Jeff Hendel	USACE	215-656-6887

A. Location and operational history of the facility, including all wastes generated at the facility and their management.

The Kiwi Brands facility is located on Route 662, Douglassville Township, Berks County, Pennsylvania (see Figure 1). Operation at this facility began in 1980 after Kiwi Brands moved from Pottstown, PA. This particular Kiwi Brands facility manufactures a variety of shoe care and toilet bowl products (i.e., shoe polish, cleaners, etc.). The facility is located in an agricultural/residential/light industrial area, which is served by public water and sewer. Primarily, the hazardous waste generated by the Kiwi facility includes various forms of waste shoe polish, bleach toilet bowl tablets, cleaning solvents, and aerosol containers. A site map is available as Figure 2.

From 1980 until 1986, the facility utilized mercury containing products in its manufacturing process. In 1986 the facility stopped using mercury containing products and, as a result, did not

continue to seek a Part B permit. Also, Dr. Mellinger indicated that wastes have always been stored for less than 90 days. Compliance with this permit ensures that hazardous waste is handled in a controlled manner that is protective of human health and the environment. Permits also serve as an implementation mechanism, and as a means by which EPA can track waste management at facilities that choose to handle hazardous waste. Also, accumulating waste on a site for less than 90 days is an exemption for permit filing.

B. Description of all Solid Waste Management Units (SWMUs) and/or Areas of Concern (AOCs) as well as description of known and/or potential releases.

Current Solid Waste Management Units

- Main Drum Storage Area – storage area for drums containing hazardous and non-hazardous waste waiting for off site disposal. The drums were properly labeled and dated. The storage area is surrounded by a chain link fence that is kept locked and has steel sealed curbing with soft dikes at the access points for tow motors to enter and exit. See Figure 3 and Picture 1.
- Aerosol Waste Storage Area – storage area for drums containing waste aerosol cans waiting for off site disposal. The storage area is located in a special room that has been designed for storing aerosol containers. The room has automatic closing doors and gates in the event of fire and a fire suppression system. All waste containing drums were properly labeled and dated. See Figure 3 and Picture 2.
- Evaporating Unit – The facility has three stainless steel lined concrete pits in the rear of the building that are used to evaporate liquid waste from the production lines. Sludge from the pits is disposed of off site as a non-hazardous waste. Prior to 1986, sludge containing mercury was produced from the evaporator unit. Sludge produced by the evaporator is characterized before disposal. Refer to Figure 3 and Pictures 3 & 4.

Areas of Concern

- Flammable Liquids Storage/Fill Area – Storage area for drums containing flammable liquids. The area is located in a fire/explosion proof room and has appropriate secondary containment. All drums are properly labeled and dated. See Figure 3 and Picture 5.

Past hazardous material releases at the site include the following:

- January 29, 1988 – 700 gallon mineral spirits release (refer to Figure 4). During a bulk delivery of mineral spirits to an underground storage tank, a faulty tank level indicator was the cause of a tank overflow. Cleanup operation were immediately undertaken, and included collection of any recoverable mineral spirits, excavation of approximately 120 tons of contaminated soil, and installation of three recovery wells. In a letter from Mr. Mellinger to Ms. Susan Kinkaid of PADEP dated November 23, 1994, Kiwi presented a “Certificate of Soil Remediation” from Soil Remediation of Philadelphia, Inc. confirming that the soil contaminated by the release was properly disposed. In late 1993, Kiwi

with
Sep 15, 1990,



removed the UST containing the mineral spirits and replaced it with above ground storage tanks. In a letter from Mr. Mellinger of Kiwi Brands to Mr. F. William Noll of PADEP dated August 29, 1995, Kiwi presented analytical data of groundwater associated with the UST removal.

- September 6, 1988 – Unknown amount of a surfactant (Neodol 25-7) released. During unloading of the raw material, tank overfill released an unknown amount of surfactant onto the building's rooftop, down rainwater downspouts, and flowed into an on-site fire pond. In a letter dated October 10, 1989 from PADEP, "Kiwi has demonstrated to the Department's [Pennsylvania DEP] satisfaction that the neodol 25-7 spill has been sufficiently remediated through the temporary storage of affected pond sludge and biodegradation on the neodol 25-7." See Figure 4.
- July 24, 1990 – 35 to 50 gallons of mineral spirits were released at an UST area during unloading operations. According to a letter from Mr. David Cusumano, Senior Environmental Chemist of Kiwi Brand to Mr. Kerry Leib of PADEP dated April 7, 1992; "Remedial action which was taken included purging the three recovery wells which are located by the spill area". Also, according to the letter, "Additionally, as part of the measures implemented to prevent future spills during truck unloading operations, Kiwi Brands Inc. has installed a tank overfill protection system".

C. Description of exposure pathways for all releases or potential releases.

- Air: There are several residential homes surrounding the facility that could be affected by air contamination.
- Groundwater: Unknown exposure pathway.
- Surface Water: Unknown exposure pathway.
- Soil: The facility is not surrounded by a fence. Therefore, trespassers could be exposed to any contaminated soil.

D. Exposure pathway controls and/or releases controls instituted at the facility.

- Air: There are no pathway or release controls instituted at this time.
- Groundwater: There are no pathway or release controls instituted at this time.
- Surface Water: There are no pathway or release controls instituted at this time.
- Soil: There are no pathway or release controls instituted at this time.

E. Observations made during visual inspection

EPA or State permitted activities

- Aboveground Storage Tanks - Mineral Spirits: Aboveground storage tanks containing mineral spirits are located outside of the southeast corner of the building (see Figure 2 and Picture 6). The tanks have secondary containment (concrete pit) and all piping is double-walled.
- Aboveground Storage Tanks - Paraffin: Three heated aboveground storage tanks containing liquid paraffin are located outside of the southeast corner of the building. Refer to Figure 2 and Picture 7. There is no secondary containment. In the event of a release of liquid paraffin, the paraffin would solidify, preventing it from contaminating groundwater, surface water and air. Soil would be affected, however, the soil could be easily removed.
- Underground Storage Tank: Located at the facility is a 10,000 gallon UST containing fuel oil. The tank was installed in 1995 and according to Mr. Mellinger the tank meets the technical requirement (i.e., leak detection, double walled, etc.) for a UST.

Areas requiring periodic inspection

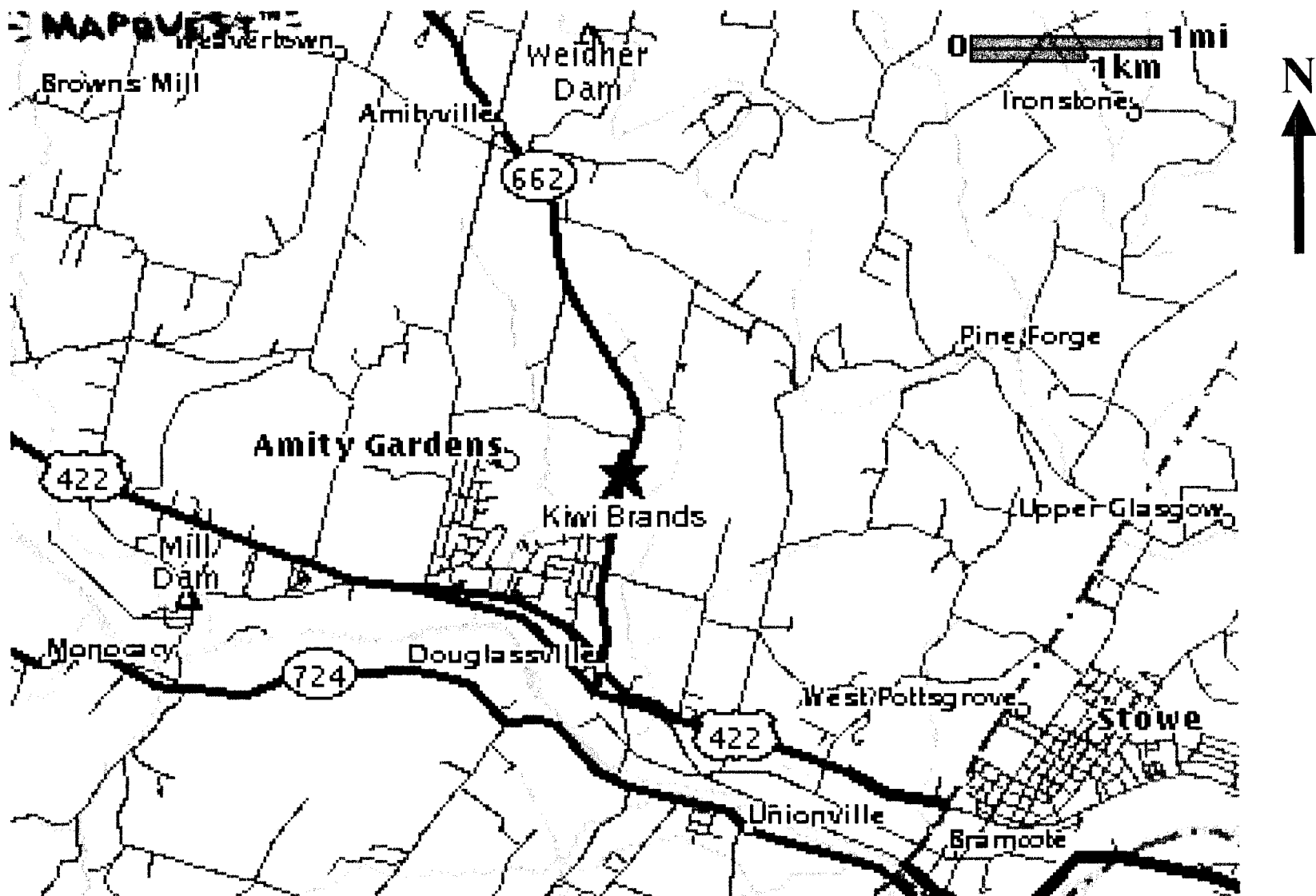
- Other than the required Hazardous Waste Inspection as required by RCRA, there are no additional areas requiring periodic inspection.

F. Follow-up action items

No follow-up action items recommended at this time.

Attachment 1
Figures

Figure 1 - Site Location Map, Kiwi Brands



Source: Internet - 1998 GeoSystems Global Corp.; 1998 NavTech

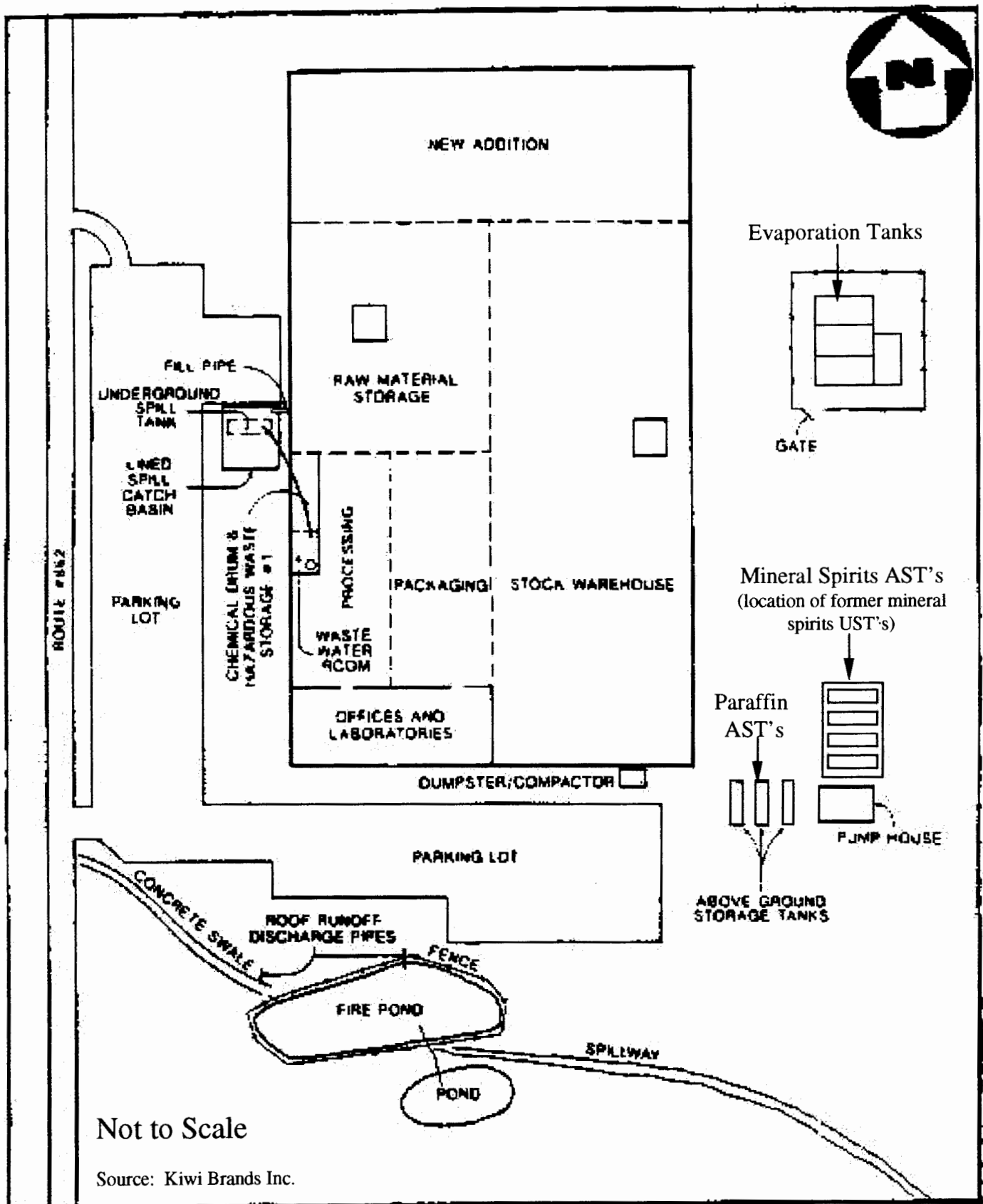


Figure 2 - Site Map, Kiwi Brands

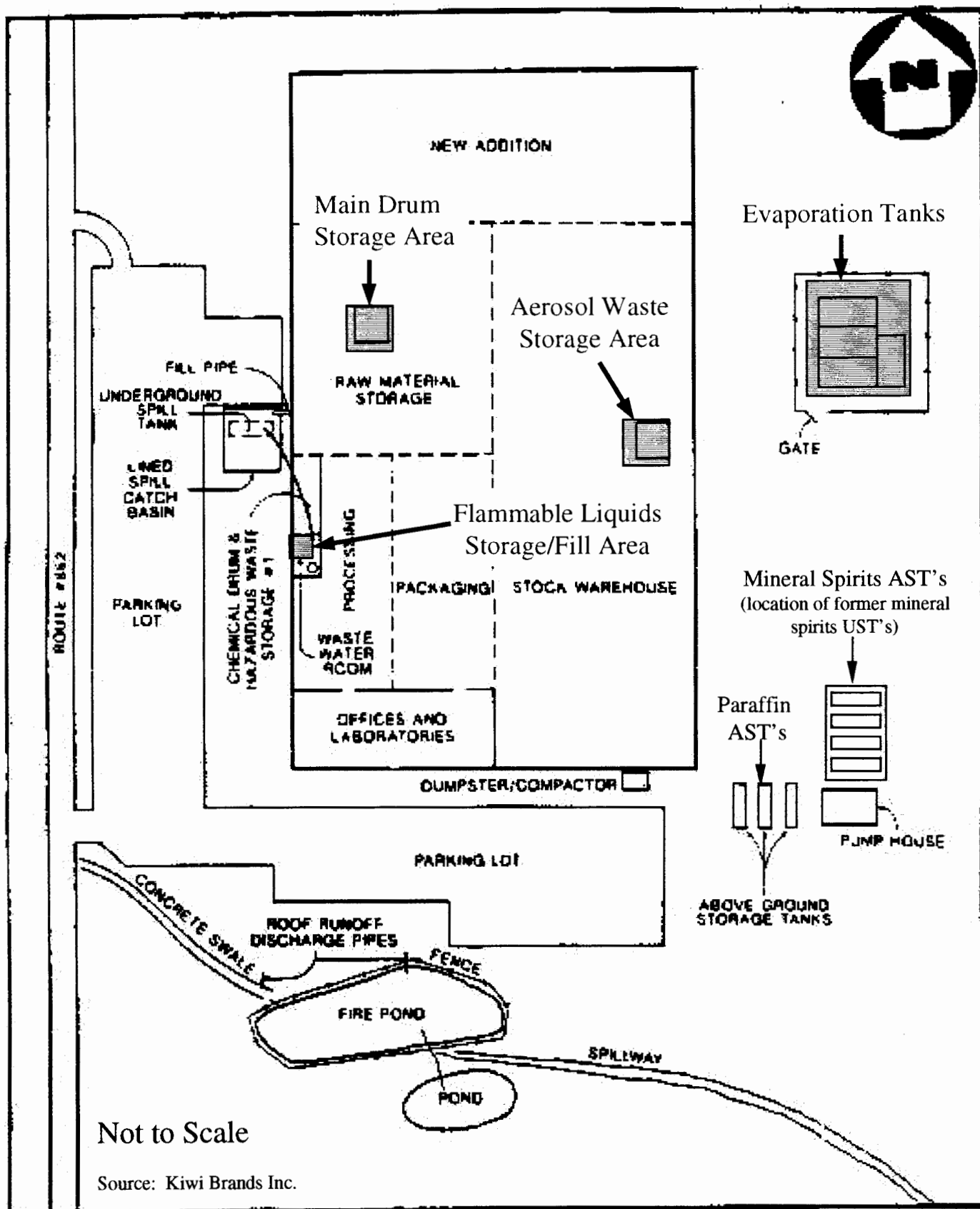


Figure 3 - SWMU's & AOC's, Kiwi Brands

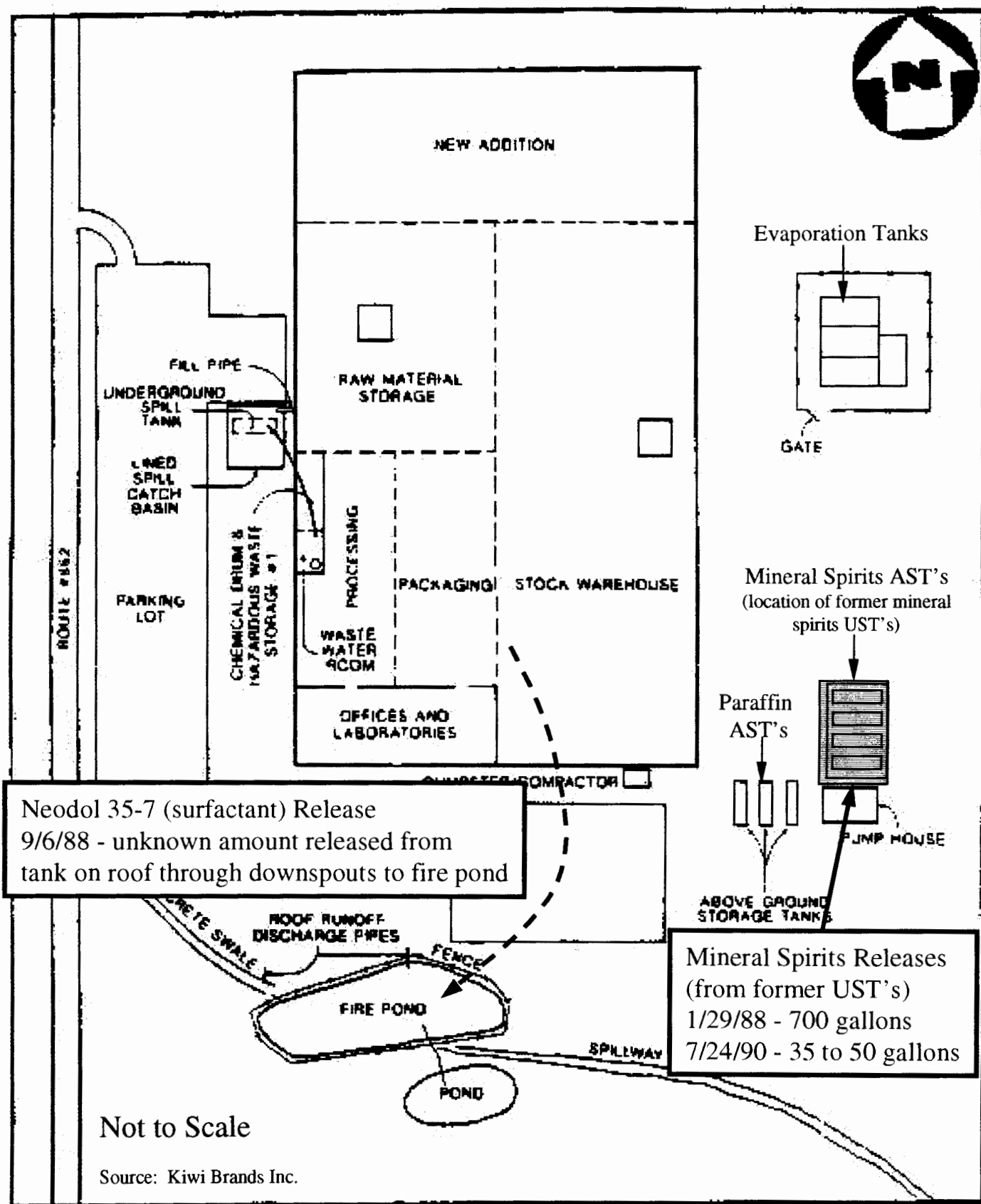


Figure 4 - Past Releases, Kiwi Brands

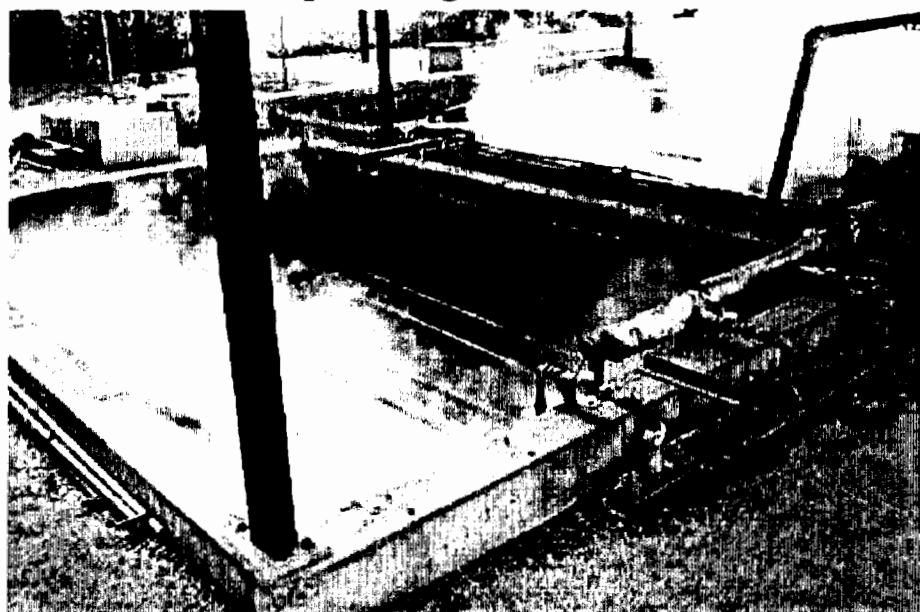
Attachment 2
Pictures



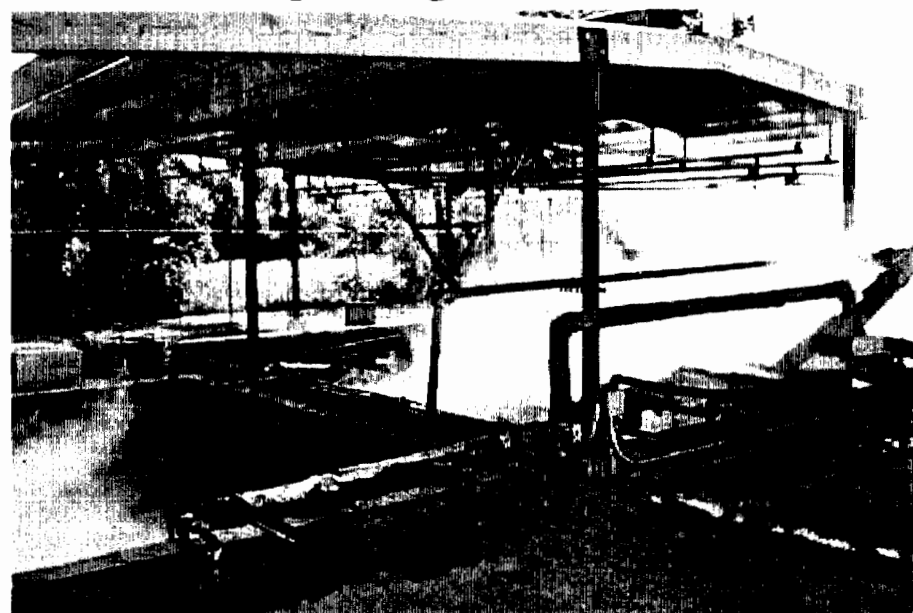
**Picture 1 - Main Drum Storage Area
(Hazardous & Non-hazardous Waste)**



**Picture 2 - Aerosol Waste Collection &
Storage Area**



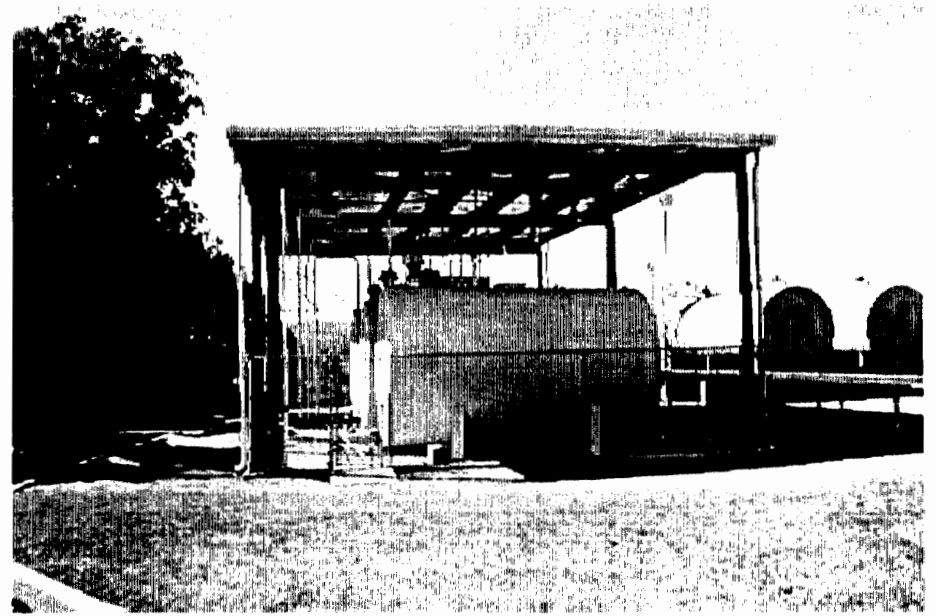
Picture 3 - Evaporating Unit



Picture 4 - Evaporating Unit

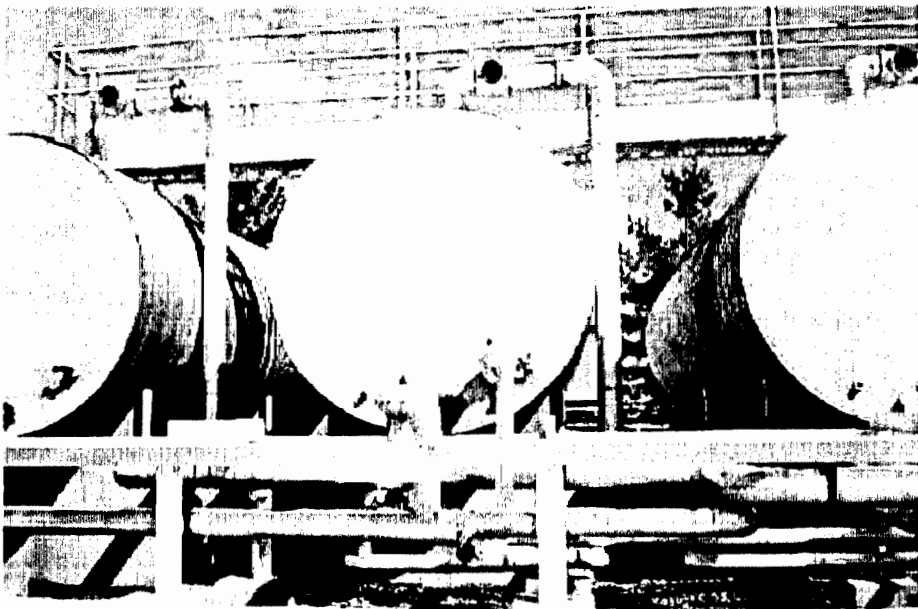


Picture 5 - Flammable Liquids Fill/Storage Area



Picture 6 - Mineral Spirits AST's

Picture 7 - Paraffin AST's



Appendix A

Correspondences and Analytical Data Documenting Closures of Spills and Releases

Table of Contents

Appendix A Correspondences and Analytical Data Documenting Closures of Spills and Releases

- Correspondences between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated June 10, 1988 and February 12, 1988:
Subject: 700 gallon mineral spirits spill.
- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated September 20, 1989
Subject: Analytical results from three recovery wells in support of the 700 gallon mineral spirits release.
- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated October 10, 1989
Subject: Closure letter for the Neodol 25-7 release.
- Correspondence between Kiwi Brands, Inc and USEPA dated December 1, 1997
Subject: Waste Management Documentation
- Analytical Report from SSM Laboratories to Kiwi Brands, Inc. dated February 10, 1992
Subject: Mineral Spirit Wells Groundwater Data.

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 PHONE: (215) 385-3041 • CABLES: KIWI DOUGLASSVILLE • TELEX: 846384 • FAX: (215) 385-6177

10 June 1988

Mr. Michael Maiolie
Waste Management Specialist
PENNSYLVANIA DEPARTMENT OF ENV. RESOURCES
625 Cherry St.
Reading, PA 19602

Dear Mr. Maiolie:

On 29 January 1988, during a 7000 gallon bulk delivery of mineral spirits, a faulty tank level indicator caused an underground storage tank overfill. As a result of this incident, approximately 700 gallons mineral spirits spilled onto the ground. Cleanup actions were immediately undertaken. This included collection of any recoverable mineral spirits, excavation of approximately 120 tons of contaminated soil, and installation of three recovery wells.

Water collected from the recovery wells has been passed through a 400 gallon decanting tank. Any supernatant present was collected for off-site disposal. In addition, absorbent pads were used to remove any mineral spirits that appeared as a surface sheen on the tank. Collection of ground water in the recovery wells is still ongoing.

As background information, we have attached a copy of the letter dated 12 February 1988 which details the incident and the measures which have been taken to correct the problem.

As the next step toward returning our plant to the conditions which existed before this incident, backfilling and reseedling of the excavated areas need to be accomplished. During the initial cleanup actions, approximately 100 tons of gravel were used as backfill for the area surrounding these recovery wells. In order to restore the landscape, it will be necessary to finish backfilling the excavated area with soil and reseed.

Mr. Michael Maiolie
PA DER

Page 2

10 June 1988

The backfilling and reseeding operations should have no significant effect on the continuing ground water collection efforts. We expect to accomplish this task by 30 June 1988.

I hope this letter serves to update you on the status of our cleanup efforts. If you have any questions, I may be contacted at 215/385-3041.

Sincerely,



EDWARD R. STRAUCH, JR.
Manager, Environmental & Analytical Affairs

CW

Att.

KIWI BRANDS INC.

RT. 662 NORTH, DOUGLASSVILLE, PA 19518 • PHONE: (215) 385-3041 • CABLES: KIWI DOUGLASSVILLE • TELEX: 846384 • FAX: (215) 385-6177

12 February 1988

Mr. Fred Osman
Emergency Response Coordinator
Deputy Secretary's Office for Environmental Protection
Department of Environmental Resources
P. O. Box 2063
Harrisburg, Pennsylvania 17120

Dear Mr. Osman:

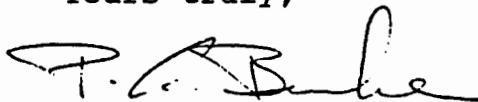
Please find enclosed a report of a mineral spirits spill which occurred at Kiwi Brands Inc., Douglassville, PA, January 29, 1988.

This is a written follow-up report complementing the verbal report made to the DER on January 29 with subsequent discussions on January 30, and February 9. In addition to the hazardous waste spill report, the following materials are included:

1. A geographical map.
2. A report on tank integrity testing, Hunter Laboratories.
3. Witco material safety data sheet on mineral spirits.

If you have any questions concerning this report, please contact me.

Yours truly,



Peter A. Burke, Ph.D.
Director Research & Development

js

cc:

M. Maiolie, PA Department of Environmental Resources
E. Trousdel, National Response Center

bcc:

J. Judd
E. L. Collier
G. T. Kilishek
E. R. Strauch

HAZARDOUS WASTE SPILL REPORT

Name: Kiwi Brands Inc.
Address: Route 662 North
Douglassville, PA 19518
EPA ID No.: PAD097153399
Incident Date: 29 January 1988
Incident Time: Approximately 10:00 a.m.
Incident Location: Mineral spirits underground storage tank #3
located on Kiwi facility (see attached diagram,
Page 6 of Kiwi PPC Plan)

Description of Incident:

A 7000 gallon bulk delivery of mineral spirits solvent was being unloaded into a 10,000 gallon underground mineral spirits tank #3. Due to a faulty manometer on Tank #3, which indicated 1400 gallons volume prior to unloading, this tank was overfilled; mineral spirits poured out of the vent pipe onto the ground.

Remedial Action Taken:

1. The snow on the ground in the vicinity of the vent pipe was shoveled into drums.
2. Free mineral spirits on the surface was soaked up with absorbent and placed into drums.
3. Containment booms were placed around the perimeter of the underground storage tank area.
4. J & J Spill Service arranged for excavation of soil. Approximately two-three feet deep mineral spirits pools were observed. The spirits was absorbed with polypropylene booms and pads, which were placed in drums.
5. Mineral spirits was also found inside concrete access vaults which set upon top of tanks. Spirits level was 3-12 inches in tank vaults #1, #2, and #3; none in #4 and #5. This spirits was manually removed into drums.

6. Excavation was continued with approximately one hundred tons of soil total removed and placed on plastic film covered asphalt. The soil piles were covered with a plastic shroud and connected booms placed around perimeter. A recovery well was positioned between tanks #1 and #2, extending down to the concrete pad. A second recovery well was placed between Tank #1 and the pumphouse. A third recovery well was placed between Tanks #2 and #3. Gravel was backfilled around the wells up to the top of the tanks. During well placement, a vacuum truck removed approximately 1000 gallons of water and minimal mineral spirits. A closed cup flash test indicated non-hazardous (>200°F). This was placed into our waste water evaporator tanks.
7. A mineral spirits separator system was constructed to pump water from each recovery well into a 400 gallon decanting tank. The well water is pumped into the decanting tank and allowed to separate for thirty minutes. Any supernatant spirits is decanted from the tank, then the water is pumped to our waste water evaporator tanks. Thus far, we have passed about 20,000 gallons of water through the decanting tank, and there is a minimal sheen of mineral spirits upon the surface of the water inside the tank, which is blotted with spirits-absorbent pads. The system will remain in operation until samples of the surface liquid inside the decanting tank are free of mineral spirits when analyzed by an independent testing laboratory.
8. All tanks were pressure-tested (to 5 psi) by Kiwi personnel on 30 January 1988/31 January 1988 and found to be tight.
9. Hunter Environmental Services performed tank integrity testing on all five tanks on 5 February 1988 and 8 February 1988, and all passed testing (copy of preliminary test results attached).
10. A french drain was inspected, which is located at the tank top level and extending from the vicinity of Tank #1 toward the east boundary of our facility. The soil near the end of the drain was excavated, and no spirits contamination was found. This drain is considered to be the most likely egress of spirits from the underground tank area.
11. An earthen dam is in place around both the tank farm and the contaminated soil piles to contain any possible run-off water containing spirits. This run-off would be diverted back to the underground tank area where the mineral spirits separator system is in place.

Estimate of Recovered Mineral Spirits:

Contaminated snow	Minimal	Placed in evaporato tanks as per direc- tive of M. Maiolie (DER) on 29 Jan 88.
Absorbent pads/booms/granules	250-300 gal	To be sent to approved landfill.
Contaminated soil	75 gal	To be sent to approved landfill.
Removed from concrete vaults	350 gal	Send to waste pro- cessing facility for use in fuel re- covery program.

Approx. 700 gal

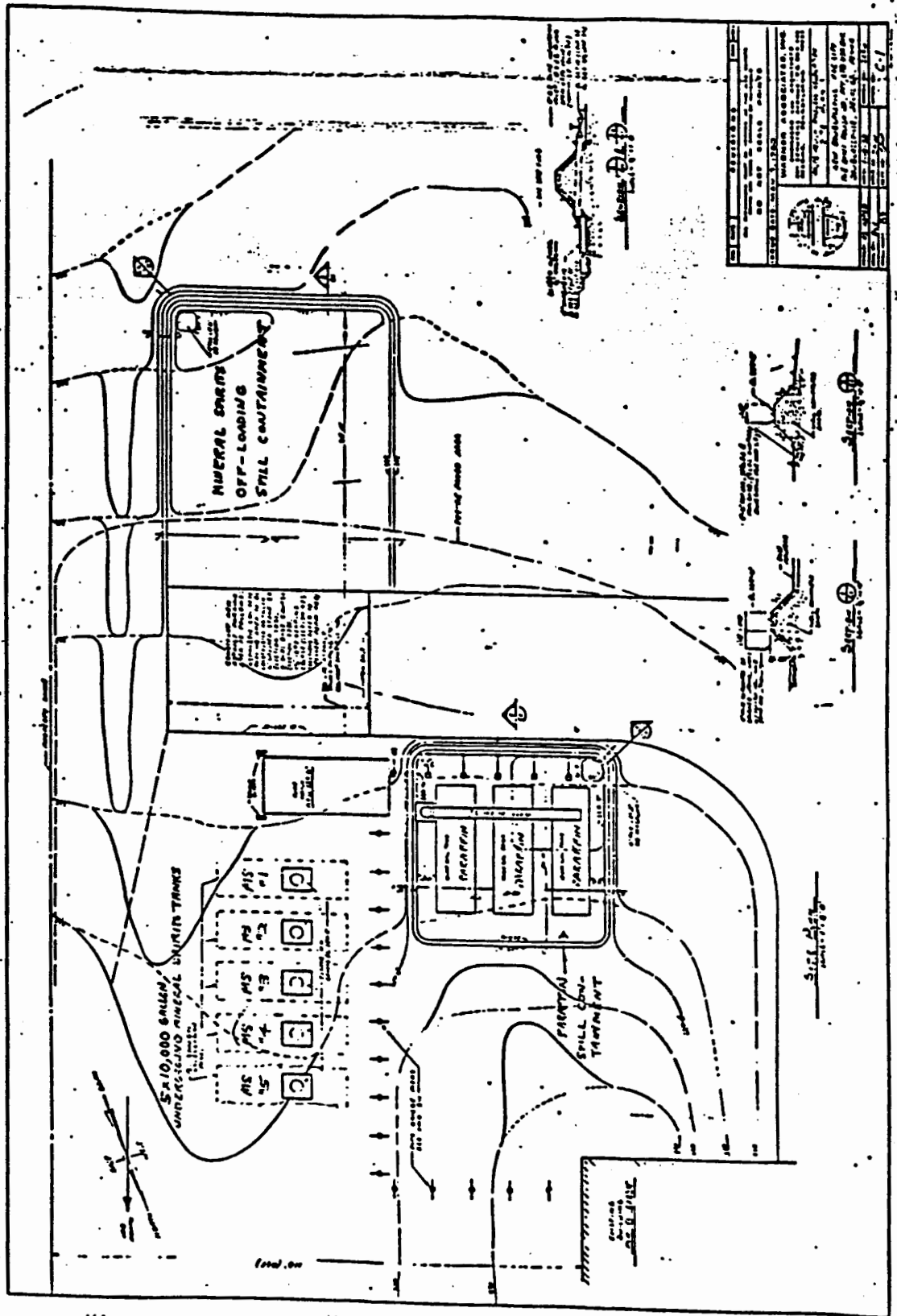
Preventive Measures To Be Taken:

1. Prior to unloading future deliveries, the current underground tank contents will be verified by manual sticking the tank to insure adequate space to fit the delivery.
2. We are in the process of returning the manometers on all five tanks to the manufacturer for repair and calibration.
3. We are investigating the purchase of the following equipment:
 - a. Overfill protection device
 - b. In-tank product level sensors

Contacts with government agencies:

1. Contacted DER (Mr. Osman) - 11:00 to 11:45 a.m. on 29 Jan 88.
2. Contacted Emergency Response Center - 11:00 to 11:45 a.m. on 29 Jan 88.
3. Visit to site by M. Maiolie of PA DER - 2:00 p.m. on 29 Jan 88.
4. Recontacted DER (Wayne Levy) - 5:00 p.m. on 30 Jan 88.
5. DER inspectors (M. Maiolie and Kyle Schmeck) visited site - 1:00 p.m. on 9 Feb 88.

ERS/ep:2/12/88



DATE	10/1/54	BY	J. H. H.
PROJECT	MATERIAL STORAGE OFF-LOADING SPILL CONTAINMENT		
DESCRIPTION	MATERIAL STORAGE OFF-LOADING SPILL CONTAINMENT		
REVISIONS	1. 10/1/54 J. H. H. Initial Design 2. 10/1/54 J. H. H. Final Design 3. 10/1/54 J. H. H. Final Design		

□ Canton, OH
(216) 453-1800

XX Philadelphia, PA
(215) 296-7380

□ Los Angeles, CA
(714) 962-7203

□ Dallas, TX
(214) 373-0888

DATE 2-5-88

CONTACT: Ed Straka 215-385-924

LOCATION: Kiwi Brands

CUSTOMER: Kiwi Brands

LL: 9 Route 662 North

Route 662 North

JR Douglassville, PA

Douglassville, PA

SYSTEM# PRODUCT	TANK SIZE		WATER LEVEL (IN.)	LEAK LOKATOR RESULTS*			CONCLUSION		COMMENTS
	GALLON	DIAM. (IN.)		GRADE (IN.)	TEST LEVEL (IN.)	GPH	PASS/FAIL		
Mineral Spirits	10000	96	0	136	140	-.029	X		
Mineral Spirits	10000	96	0	137	141	-.021	X		
Mineral Spirits	10000	96	0	145	144	-.031	X		

ADDITIONAL COMMENTS

RECEIVED

FEB 11 1988

R & D

*GRADE - INCHES FROM BOTTOM OF TANK

TEST LEVEL - INCHES FROM BOTTOM OF TANK

GPH - ABSOLUTE LEAK RATE (MEASURED LEAK RATE - TEMPERATURE COMPENSATION) IN GALLONS PER HOUR

CONCLUSION IS BASED ON NFPA 329 STANDARD OF ± 0.05 GPH

ADDITIONAL SERVICES

PRODUCT LINES — HYDROSTATIC PRESSURE TEST RESULTS

SYSTEM	TYPE OF PUMP		# APPLIED	MINUTES APPLIED	PRODUCT LOSS CC'S	PRODUCT LOSS GPH	CONCLUSION		COMMENTS
1	Ind.	Remote <input type="checkbox"/> Submersible <input checked="" type="checkbox"/>	Suction <input checked="" type="checkbox"/>					PASS <input type="checkbox"/>	FAIL <input type="checkbox"/>
2	Ind.	Remote <input type="checkbox"/> Submersible <input type="checkbox"/>	Suction <input checked="" type="checkbox"/>					PASS <input type="checkbox"/>	FAIL <input type="checkbox"/>
3	Ind.	Remote <input type="checkbox"/> Submersible <input type="checkbox"/>	Suction <input checked="" type="checkbox"/>					PASS <input type="checkbox"/>	FAIL <input type="checkbox"/>
		Remote <input type="checkbox"/> Submersible <input type="checkbox"/>	Suction <input type="checkbox"/>					PASS <input type="checkbox"/>	FAIL <input type="checkbox"/>

QTY	PART #	DESCRIPTION	PRICE EA.	QTY	PART #	DESCRIPTION	PRICE

TECHNICAL REVIEW

506 / 6 1/2 & 4

□ Canton, OH
(216) 453-1800

☒ Philadelphia, PA
(215) 296-7380

□ Los Angeles, CA
(714) 962-7203

□ Dallas, TX
(214) 373-0888

DATE 2-8-88

CONTACT: Ed Straka 215-385-97

LOCATION: Kiwi Brands CUSTOMER: Kiwi Brands
 LL: 9 Route 662 North Route 662 North
 JR/WL Douglassville, PA Douglassville, PA

SYSTEM# PRODUCT	TANK SIZE		WATER LEVEL (IN.)	GRADE (IN.)	LEAK LOKATOR RESULTS*			CONCLUSION PASS/FAIL	COMMENTS
	GALLON	DIAM. (IN.)			TEST LEVEL (IN.)	GPH			
Tank #4 Min Spts	10000	96	0	148	154	-.011	X		RECEIVED
Tank #5 Min Spts	10000	96	0	153	157	-.032	X		FEB 11 1988
									R&D

ADDITIONAL COMMENTS _____

*GRADE - INCHES FROM BOTTOM OF TANK
 TEST LEVEL - INCHES FROM BOTTOM OF TANK
 GPH - ABSOLUTE LEAK RATE (MEASURED LEAK RATE - TEMPERATURE COMPENSATION) IN GALLONS PER HOUR
 CONCLUSION IS BASED ON NFPA 329 STANDARD OF ±0.05 GPH

ADDITIONAL SERVICES

PRODUCT LINES — HYDROSTATIC PRESSURE TEST RESULTS

SYSTEM	TYPE OF PUMP		# APPLIED	MINUTES APPLIED	PRODUCT LOSS CC'S	PRODUCT LOSS GPH	CONCLUSION		COMMENTS
#4	Ind.	Remote <input type="checkbox"/> Submersible <input checked="" type="checkbox"/>	Suction <input checked="" type="checkbox"/>				PASS <input type="checkbox"/> FAIL <input type="checkbox"/>		
#5	Ind.	Remote <input type="checkbox"/> Submersible <input checked="" type="checkbox"/>	Suction <input checked="" type="checkbox"/>				PASS <input type="checkbox"/> FAIL <input type="checkbox"/>		
		Remote <input type="checkbox"/> Submersible <input type="checkbox"/>	Suction <input type="checkbox"/>				PASS <input type="checkbox"/> FAIL <input type="checkbox"/>		
		Remote <input type="checkbox"/> Submersible <input type="checkbox"/>	Suction <input type="checkbox"/>				PASS <input type="checkbox"/> FAIL <input type="checkbox"/>		

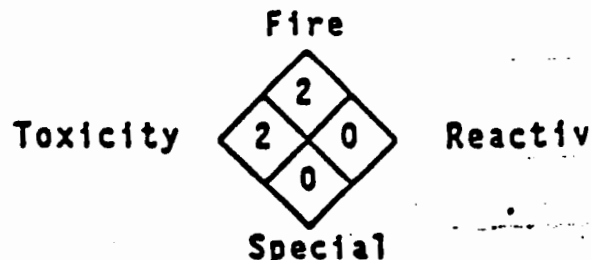
QTY	PART #	DESCRIPTION	PRICE EA.	QTY	PART #	DESCRIPTION	PRICE

KENSOL 30

PAGE 1

Product Code: C04 4111

HAZARD RATING
 N 4 - Extreme
 F 3 - High
 P 2 - Moderate
 A 1 - Slight
 0 - Insignificant



DIVISION AND LOCATION---SECTION I

Division: KENDALL/AMALIE
Location: BRADFORD, PENNSYLVANIA
 77 N. KENDALL AVE. BRADFORD, PA, 16701
Emergency Telephone Number: (814) 368-6111
Transportation Emergency: CHEM TREC 1-(800) 424-9300 (U.S. and Canada)

CHEMICAL AND PHYSICAL PROPERTIES---SECTION II

Chemical Name:
 petroleum hydrocarbon
Formula: not applicable
Hazardous Decomposition Products:
 carbon monoxide and carbon dioxide from burning.
Incompatibility (Keep away from):
 strong oxidizers such as hydrogen peroxide, bromine, and chromic acid.
Toxic and Hazardous Ingredients:
 Stoddard solvent
Form: liquid
Appearance: low viscosity liquid
Specific Gravity (water=1): .77
Boiling Point: greater than 154°C (310°F)
Melting Point: not applicable
Solubility in Water (by weight %): 0 at 20°C
Volatile (by weight %): 100
Evaporation Rate: (n butyl acetate = 1) .2
Vapor Pressure (mm Hg at 20°C): 3
Vapor Density (air=1): 4.85
pH (as is): not applicable
Stability: Product is stable under normal conditions
Viscosity SUS at 100°F: Less than 100

CAS #
 8052-41-3

FIRE AND EXPLOSION DATA---SECTION III

Special Fire Fighting Procedures:
 Do not use water except as fog
Unusual Fire and Explosion Hazards:
 Avoid all ignition sources such as flames and sparks
Flashpoint: (Method Used) Tag closed-cup 38°C (101°F)

(Continued on next page)

W I T C O M A T E R I A L S A F E T Y D A T A S H E E T

KENSOL 30

PA
Product Code: C04 4111

(Section III continued)

Flammable limits %:

Lower: 1 Upper: 7

Extinguishing agents:

Drychemical or Waterfog or CO₂ or Foam
Exposed material may be cooled with water.

HEALTH HAZARD DATA---SECTION IV

Permissible concentrations (air):

stoddard solvent: 500 ppm (OSHA); 100 ppm (ACGIH); STEL 200 ppm (ACGIH)

Chronic effects of overexposure:

Irritation of eyes, nose and throat. Dizziness. Dermatitis.

Acute toxicological properties:

no data available

Emergency First Aid Procedures:

Eyes: Immediately flush with large quantities of water for at least 15 minutes and call a physician.

Skin Contact: Remove excess with cloth or paper. Wash thoroughly with soap and water.

Inhalation: Remove victim to fresh air. Call a physician.

If Swallowed: Call a physician immediately. DO NOT induce vomiting. (Vomiting may cause aspiration into lungs resulting in chemical pneumonia.)

This statement is required under federal regulations for consumer products. Although this product is intended for industrial use, the statement is included because of the possibility of consumer use.

SPECIAL PROTECTION INFORMATION---SECTION V

Ventilation Type Required (Local, mechanical, special):

Local if necessary to maintain allowable PEL(permissible exposure limit) or TLV(threshold limit value)

Respiratory Protection (Specify type):

Use NIOSH/OSHA approved respirator with organic vapor cartridge if vapor concentration exceeds permissible exposure limit

Protective Gloves: neoprene type

Eye Protection: chemical safety goggles.

Other Protective Equipment:

none

HANDLING OF SPILLS OR LEAKS---SECTION VI

Procedures for Clean-Up:

Avoid all ignition sources such as flames and sparks. Insure good ventilation. If volume is significant, transfer into containers for disposal. Seal container

(Continued on next page)

WITCO MATERIAL SAFETY DATA

KENSOL 30

Product Code: C04 4111

(Section VI continued)

tightly. Absorb on an inert ingredient such as earth, sand or vermiculite. Sweep up and dispose of according to Federal, State and local regulations.

Waste Disposal:

Dispose of in accordance with all applicable federal, state and local regulations.

SPECIAL PRECAUTIONS---SECTION VII

Precautions to be taken in handling and storage:

Avoid all ignition sources such as flames and sparks.

Do not handle or store at temperatures over

Maximum Storage Temperature: 38°C (100°F)

TRANSPORTATION DATA---SECTION VIII

D.O.T.: Regulated

U.S. D.O.T. Proper Shipping Name: Petroleum naphtha

U.S. D.O.T. Hazard Class: Combustible liquid

U.D. Number: UN 1255

Label(s) Required: none

Portable Quantity: none

Freight Classification: Petroleum Naphtha-Combustible Liquid

Special Transportation Notes:

Unregulated by DOT when shipped in containers of less than 110 gallons.

COMMENTS---SECTION IX

Signature: LUTHER DROMGOLD

Title:

MGR., NEW PRODUCTS

Original Date: 06/03/80

Sent to:

Date: _____

Revision Date: 04/24/86

Supersedes: 10/03/83

We believe the statements, technical information and recommendations contained herein are reliable, but they are given without warranty or guarantee of any kind, express or implied, and we assume no responsibility for any loss, damage, or expense, direct or consequential, arising out of their use.



KIWI BRANDS INC.

Division of Sara Lee Corporation

RT. 662, DOUGLASSVILLE, PA 19518 • PHONE: (215) 385-3041 • FAX: (215) 385-6177 • TELEX: 846384

20 September 1989

Michael Maiolie
Waste Management Specialist
PENNSYLVANIA DEPARTMENT OF ENV. RESOURCES
625 Cherry St.
Reading, Pa. 19606

Dear Mike:

I am forwarding to you the results of the recovery well testing at Kiwi Brands Inc. We had an overfill during a delivery of mineral spirits into our underground tank #3 on 29 January 1988. As a result, approximately 700 gallons mineral spirits spilled onto the ground. Remedial action included collection of any recoverable mineral spirits, excavation of approximately 120 tons of contaminated soil, and installation of three recovery wells to the depth of the bottom of the storage tanks. The incident report dated 12 February 1988, which we sent to you, fully describes our response activities.

Initially, water collected from the recovery wells was passed through a 400 gallon decanting tank to collect supernatant solvent. This was performed regularly for the first three months until no observable supernatant solvent was being removed. Henceforth, we would pump water from each of the wells into our wastewater system to remove residual solvent.

Well testing was performed every six months to monitor the residual solvent level. To prepare for the well testing, standing water was removed from each well by pumping for one-half hour at 35 gpm or until the wells were emptied. A representative of RMC Environmental Labs would sample each well. As we agreed to do, the total petroleum hydrocarbon level was analyzed by method 418.1.

The test results were as follows:

Department of Environmental Resources

Reading District Office
625 Cherry Street
Reading, PA 19602
215-378-4175

October 10, 1989

Mr. David Cusumano
Kiwi Brands Incorporated
Route 662
Douglassville, PA 19518

Re: Neodol 25-7 Spill Remediation
Amity Township, Berks County

Dear Mr. Cusumano:

This letter is in response to your letter of July 25, 1989 and the follow-up meeting held at Kiwi Brands on September 25, 1989. Kiwi has demonstrated to the Department's satisfaction that the neodol 25-7 spill has been sufficiently remediated through the temporary storage of affected pond sludge and biodegradation of the neodol 25-7.

Therefore the Department grants approval to Kiwi to empty and dismantle the temporary pond sludge holding area as discussed at our meeting. Erosion of the disturbed areas should be controlled until vegetation can be established.

If you have any questions please feel free to contact me at 215-361-2070 or 215-378-4175.

Very truly yours,

MICHAEL PAIOLLE
Field Operations Supervisor

cc: Norristown Regional File
Reading District File ✓
Mr. Zwalinski
Re30 1210.1



KIWI BRANDS
Division of Sara Lee Corporation

447 OLD SWEDE ROAD, DOUGLASSVILLE, PA 19518-1239 • PHONE: (610) 385-3041 • FAX: (610) 385-6177

1 December 1997

Mr. Kevin Boyd
U. S. Environmental Protection Agency
Region III
841 Chestnut Building - 3HW80
Philadelphia, PA 19107-4431

RE: WASTE MANAGEMENT DOCUMENTATION

Dear Mr. Boyd:

As requested by you during your visit to our facilities on 18 November 1997, I have enclosed a copy of the following documents:

- PADEP Hazardous Waste Inspection Report - Generators dated 12 June 1997 by S. Werner, PADEP
- Letter dated 29 August 1995 to W. Noll, PADEP, from M. Mellinger, Kiwi Brands, regarding groundwater sampling results in reference to the removal of our mineral spirits UST's
- Letter dated 23 November 1994 to S. Kinkaid, PADER, from M. Mellinger, Kiwi Brands, regarding the disposal of mineral spirits' contaminated soil from a mineral spirits release on 13 September 1994

Letter dated 7 April 1992 to K. Leib, PADER, from D. Cusumano, Kiwi Brands, regarding groundwater sampling results in reference to a mineral spirits release on 24 July 1990

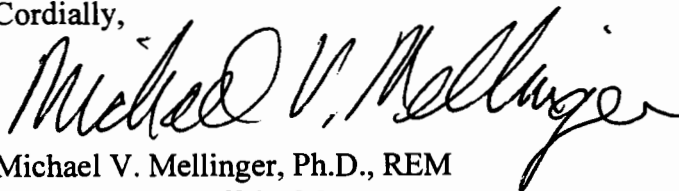
- Letter dated 17 January 1990 to P. Burke, Kiwi Brands, from R. Cook, PADER, regarding the successful remediation of a Neodol 25-7 release on 6 September 1988

- Letter dated 10 October 1989 to D. Cusumano, Kiwi Brands, from M. Maiolie, PADER, regarding the successful remediation of a Neodol 25-7 release on 6 September 1988
- Letter dated 20 September 1989 to M. Maiolie, PADER, from E. Strauch, Kiwi Brands, regarding groundwater sampling results in reference to a mineral spirits release on 29 January 1988
- Memo dated 4 May 1987 to P. Burke, Kiwi Brands, from E. Strauch, Kiwi Brands, documenting a telephone conversation with M. Maiolie, PADER, regarding the closure of our evaporator tanks (RCRA hazardous waste collection system)
- Letter dated 18 September 1986 to M. Maiolie, PADER, from E. Strauch, Kiwi Brands, regarding the closure of our evaporator tanks (RCRA hazardous waste collection system)
- Letter dated 10 September 1986 to P. Burke, Kiwi Brands, from M. Maiolie, PADER, regarding the closure of our evaporator tanks (RCRA hazardous waste collection system)

I understand that this information will be added to our RCRIS file along with your inspection report.

If you need additional information or have any questions, please contact me at 610-385-9246.

Cordially,

A handwritten signature in black ink, reading "Michael V. Mellinger". The signature is fluid and cursive, with the first name "Michael" and last name "Mellinger" clearly legible.

Michael V. Mellinger, Ph.D., REM
Environmental Affairs Manager

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

RECEIVED

JUN 19 1997

KIWI BRAND
ENVIRONMENTAL A

Date of Inspection 6-12-97 Time start _____ Time finish _____
 Name of Inspector Susan M. Werner
 Company, installation name Kiwi Brands Inc.
 Location 447 Old Swede Road
 County Berks Municipality Amity Twp
 Identification number PA0 097153399
 Name of responsible official Mike Mellinger ~~Environmental Affairs Manager~~
 Title Environmental Affairs Manager
 Mailing Address 447 Old Swede Road Douglassville PA 19518-1239
 Area code and telephone number 610 385 3041
 Name of person interviewed Mike Mellinger
 Title Environmental Affairs Manager
 Mailing address (if different from above) Same
 Area code and telephone number Same

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
 b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
 c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
 d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. 5139.9 kg./mo.
 b. 61643.4 kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
0001, 0006, 0007, 0019 0029, 0022, F002 F003, F005, U226	ENSCO GAD 000222083	Dalton, GA Disposal, Blending

4. Source Reduction: ☒ accomplished, ☒ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name Kiwi Brands Inc. ID Number PAD 097 153399 Date 06-12-97

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
1				Hazardous waste determination, performed on all waste streams	262.11	H001
1				Identification number	262.12	H002
1				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
	2			Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
	2			PA manifest used for intrastate shipments	262.20(b)	H005
1				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
1				Manifests filled out properly and completely	262.20(g)	H007
1				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
		3		Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
		3		Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
1				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
1				Placards offered to transporter	262.33	H012
1				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
1				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
1				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
1				a). All containers of haz. waste in good condition	265.171	H016
1				b). Containers compatible with hazardous waste being stored within	265.172	H017
1				c). Containers of hazardous waste kept closed	265.173(a)	H018
1				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
1				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
1				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
1				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
				h). Proper containment and collection system(s)	265.178	H023
1				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
1				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

**Hazardous Waste Inspection Report
Generators - Part B**

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
				Records retained at designated location for 20 years	262.40(a)	H001
	2			Quarterly reports submitted to the Department	262.41(a)	H027
1				Exception reporting procedures followed	262.42	H028
	2			Hazardous waste disposal plan, if required	262.45	H029
1				Spill reporting procedures followed	262.46(a)	H030
1				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
	2			Special requirements followed for international shipments	262.50, .53, .55, .60	H032
1				Source reduction strategy prepared and available	262.80	H033

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection: June 12, 1997

Identification Number: PAD097153399

Company/Facility/Site Name: Kiwi Brands, Inc.

I arrived on-site and met with Mr. Mike Mellinger. We proceeded on an inspection of the hazardous and residual waste generation and storage areas.

38 drums of hazardous waste and 29 drums of residual waste were observed in the main drum storage area. This area has been upgraded since the last inspection. During the last inspection, cracks were observed in the floor near the drums. Since then, the cracks have been filled and the floor painted with a sealant. Steel sealed curbing has been installed all around the storage area with soft dikes at the access points for tow motors to get in and out.

All the drums in the storage area were properly labelled and all labels were visible for inspection.

There were 8 drums of hazardous waste in the aerosol waste storage area. These drums were also properly labelled and visible.

The facility has three pits behind the building which are used to evaporate liquid waste from the production lines. This waste is non-hazardous and the sludge is removed to ENSCO in GA.

The facility also has a compactor dumpster for the plant trash. This dumpster is taken to Pottstown Landfill as a residual waste.

The facility is now placing all hazardous wastes into drums which are painted black with a white stripe around the middle. This is so these drums can be easily identified.

3 full drums of flammable waste were observed in the flammables room and 1 partial drum being filled. All the drums were closed and properly labelled.

After completing the inspection of the facility, we returned to the office to review the records.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature)

Michael V. Mellinger

Date

6-19-97

Inspector (Signature)

Susan M. Ziemer

Date

6-19-97

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection: June 12, 1997
Company/Facility/Site Name: Kiwi Brands, Inc.
Hazardous Waste Biennial Report

Identification Number: PAD097153399

The 1996 Biennial Report contains information about wastes generated in 1995. During 1995, the facility generated 136232 pounds of hazardous waste or 61643.4 kilograms. This works out to 5136.9 kilograms per month making the facility a large quantity generator.

Storage Area Inspection Logs

The storage areas are inspected on a daily basis and the log is filled out once a week. These logs were reviewed for the period of January 1997 to present.

Preparedness, Prevention, and Contingency Plan

This plan was updated on January of 1997 and includes all personnel changes.

Source Reduction Strategies

The SRS were written in 1992 and 1994. The facility is planning to update them after July 1, 1997.

Manifests

Manifests were reviewed for the period of January 1997 to present. During this period all waste shipped where en to ENSCO in GA.

Employee Training

Employee training was conducted in December of 1996 and is planned again in December of 1997. All employees who handle hazardous wastes were trained.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature) Michael V. Mellinger Date 6-19-97
Inspector (Signature) Susan M. Warren Date 6-19-97



KIWI BRANDS INC.
Division of Sara Lee Corporation

447 OLD SWEDE ROAD, DOUGLASSVILLE, PA 19518-1239 • PHONE (610) 385-3041 • FAX (610) 385-6177

29 August 1995

Mr. F. William Noll
PA Dept of Environmental Protection
Southcentral Regional Office
One Ararat Boulevard
Harrisburg, PA 17110

RE: UST 06-12106
Tanks 001 - 006 Removal
GW Analyses

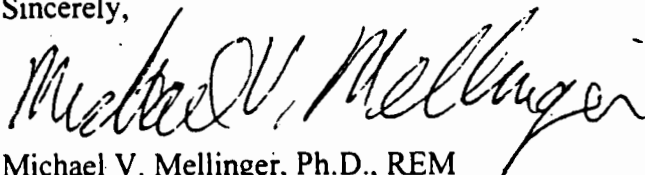
Dear Mr. Noll:

As we had previously discussed on 20 March 1995 Kiwi Brands (KB) agreed to collect and analyze groundwater from an onsite well during the summer of 1995 to investigate the presence of petroleum hydrocarbon contaminants relative to our UST mineral spirits removal project conducted in late 1993. We conducted the sampling on 2 August 1995. The well depth is 300 feet, the water level is approximately 60 feet, and the pump used to collect the sample is set at 190 feet. The analytical report is attached. Levels for all analytes is below detection limits in every case.

KB suggests that these results substantiate our conclusion that the groundwater was not contaminated as a result of the mineral spirits tanks removal. At this time we do not plan to conduct any additional sampling efforts. We would appreciate your adding this information to our file in your office so that the case can be closed. We will assume this action has been done unless notified to the contrary.

Thank you for your attention to this matter.

Sincerely,



Michael V. Mellinger, Ph.D., REM
Environmental Affairs Manager



ENVIRONMENTAL LABORATORY, INC.

RECEIVED

AUG 11 1995

KIWI BRANDS, INC.
ENVIRONMENTAL AFFAIRS

L-954109

ANALYTICAL REPORT

CLIENT: Kiwi Brands, Inc.
447 Old Swede Road
Douglassville PA 19518

REPORTED: 08-08-95
RECEIVED: 08-02-95
WORK ORDER: L-954109

SAMPLE ID: Well

SAMPLING DATE: 08-02-95

TIME: 08:05

BY: MJO

REPORT TO: Mr. Mike Mellinger

SITE LOCATION: Douglassville, PA Plant

VOLATILES

ANALYSIS

	<u>METHOD</u>	<u>UNIT</u>	<u>RESULT</u>	<u>DATE/INITIAL</u>
1,1-Dichloroethane	601	ug/L pfb <	5	08-02-95/KLG
1,1,1-Trichloroethane	601	ug/L <	5	08-02-95/KLG
1,1,2-Trichloroethane	601	ug/L <	5	08-02-95/KLG
1,1,2,2-Tetrachloroethane	601	ug/L <	5	08-02-95/KLG
1,2-Dichlorobenzene	601	ug/L <	5	08-02-95/KLG
1,3-Dichloroethane	601	ug/L <	5	08-02-95/K
Dichloropropane	601	ug/L <	5	08-02-95/K
1,2-Dichlorobenzene	601	ug/L <	5	08-02-95/KLG
1,4-Dichlorobenzene	601	ug/L <	5	08-02-95/KLG
2-Chloroethyl Vinyl ether	601	ug/L <	10	08-02-95/KLG
Benzene	602	ug/L <	5	08-02-95/KLG
Bromodichloromethane	601	ug/L <	5	08-02-95/KLG
Bromoform	601	ug/L <	5	08-02-95/KLG
Bromomethane	601	ug/L <	5	08-02-95/KLG
Carbon Tetrachloride	601	ug/L <	5	08-02-95/KLG
Chlorobenzene	601	ug/L <	5	08-02-95/KLG
Chloroethane	601	ug/L <	5	08-02-95/KLG
Chloroform	601	ug/L <	5	08-02-95/KLG
Chloromethane	601	ug/L <	5	08-02-95/KLG
Dibromochloromethane	601	ug/L <	5	08-02-95/KLG
Ethylbenzene	602	ug/L <	5	08-02-95/KLG
Methylene Chloride	601	ug/L <	5	08-02-95/KLG
Tetrachloroethene	601	ug/L <	5	08-02-95/KLG
Toluene	602	ug/L <	5	08-02-95/KLG
Trichloroethene	601	ug/L <	5	08-02-95/KLG
Trichlorofluoromethane	601	ug/L <	5	08-02-95/KLG
Vinyl Chloride	601	ug/L <	5	08-02-95/KLG
Xylenes, Total	602***	ug/L <	15	08-02-95/KLG
cis-1,3-Dichloropropene	601	ug/L <	5	08-02-95/KLG
trans-1,2-Dichloroethene	601	ug/L <	5	08-02-95/KLG
trans-1,3-Dichloropropene	601	ug/L <	5	08-02-95/KLG

C
PETROLEUM HYDROCARBONANALYSIS

	<u>METHOD</u>	<u>UNIT</u>	<u>RESULT</u>	<u>DATE/INITIAL</u>
TPH-Diesel Range Organics	8015**	mg/L <	1	08-08-98/JLW
TPH-Gasoline Range Organics	8015*	mg/L <	1.0	08-03-95/KLG

***Modified

**API Method - Solvent Extraction

* API Method - Purge & Trap

Reviewed by:


Warren L. Merrill
Laboratory Director


KIWI BRANDS INC.
Division of Sara Lee Corporation

447 OLD SWEDE ROAD, DOUGLASSVILLE, PA 19518-1239 • PHONE: (610) 385-3041 • FAX: (610) 385-6177

November 23, 1994

Ms. Susan M. Kinkaid
Pennsylvania Department of Environmental Resources
Waste Management Program
1005 Cross Roads Boulevard
Reading, PA 19605

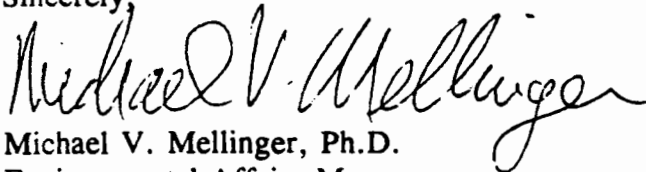
Re: Disposal of Contaminated Soil From Mineral Spirits Release - September 13, 1994

Dear Ms. Kinkaid:

As requested during your site visit on 22 September 1994, attached is a copy of the "Certificate of Soil Remediation" from Soil Remediation of Philadelphia, Inc. confirming that the soil was properly disposed.

If you need additional information, please contact me at (610)385-9246.

Sincerely,



Michael V. Mellinger, Ph.D.
Environmental Affairs Manager

Enclosure: Certificate (copy)

MVM:llh

SOIL REMEDIATION of Philadelphia, Inc.

3201 South 61st Street

Philadelphia, PA 19153

Pennsylvania Department of Environmental Resources Permitted Facility

CERTIFICATE OF SOIL REMEDIATION

Soil Remediation of Philadelphia, Inc. certifies that 26.60 tons of non-hazardous petroleum contaminated soil delivered by Allied Environmental and identified as Lot # 1489 has been processed to destroy the hydrocarbon contamination. This soil has been remediated to meet Level A Protection as established by the Pennsylvania Department of Environmental Resources Cleanup Standards issued October 18, 1991. This states that the hydrocarbons are removed so that they are non-detectable thereby allowing the soil to be considered clean fill.

Certificate Issued To: Kiewit Brando Inc.

Authorized Signature: _____

Robert J. Masters

Date: _____

10-11-94



KIWI BRANDS INC.

Division of Sara Lee Corporation

447 OLD SWEDE ROAD, DOUGLASSVILLE, PA 19518-1239 • PHONE: (215) 385-3041 • FAX: (215) 385-6177 • TELEX: 8-635-

April 7, 1992

Mr. Kerry Leib
Department of Environmental Resources
Harrisburg Region
One Ararat Blvd.
Harrisburg, PA 17110

Dear Mr. Leib:

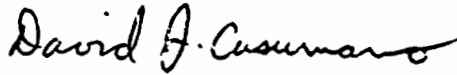
On July 27, 1990, **Kiwi Brands Inc.** submitted an initial report concerning a spill of 35 to 50 gallons of mineral spirits which occurred on July 24, 1990. Remedial action which was taken included purging the three recovery wells which are located by the spill area. Subsequently, well sampling was conducted and purging continued until well sampling indicated less than detectable levels of total petroleum hydrocarbons were present.

Attached are lab analyses which have been performed since the spill. These results indicate the levels of petroleum hydrocarbons have dropped to less than detectable levels. **Kiwi Brands Inc.** has now discontinued purging of the recovery wells.

Additionally, as part of the measures implemented to prevent future spills during tank truck unloading operations, **Kiwi Brands Inc.** has installed a tank overfill protection system. This system provides high level alarms and will automatically suspend pumping operations if the tank volume reaches 90% capacity.

I hope these actions satisfy the requirements of the Department of Environmental Resources concerning remediation of the mineral spirits spill which occurred on July 24, 1990.

Sincerely,

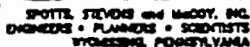
A handwritten signature in cursive script, reading "David J. Cusumano".

David J. Cusumano
Senior Environmental Chemist

DJC:jt:A-06

Attachments

cc: P. A. Burke
E. R. Strauch



110517

DOC.NO.:

REQUESTED VERBAL TO _____ WRITTEN TO D. Stanislawczyk
REPORTING DATE _____ DATE 2/19/92
TIME _____ LAB APPROVAL BY _____
TEL.NO. _____ PRIORITY CHARGES AUTH. BY PM?
☐ YES ☐ NO

SAMPLED BY: MTB DATE: 2/5/92 TIME: 1030

[illegible]

DELIVERY TO LABORATORY

CUSTODY RELINQUISHED BY: Michael J. Smith
TO: K. Hurd DATE: 2/5/92 TIME: 15:10

INTRALABORATORY TRANSFER

CUSTODY RELINQUISHED BY: _____
TO: _____ DATE: _____ TIME: _____

DISPOSAL

CUSTODY RELINQUISHED BY: _____
TO: _____ DATE: _____ TIME: _____

COMMENTS: _____



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

Reading District Office
625 Cherry Street
Reading, PA 19602
215-378-4175



January 17, 1990

Mr. Peter A. Burke, Director
Research & Development
Kiwi Brands, Inc.
Route 662 North
Douglassville, PA 19518

Re: Pollution Incident
Kiwi Brands-Neodol 25-7 Spill
Amity Township, Berks County

Dear Mr. Burke:

This shall serve to acknowledge an incident which occurred at your facility on September 6, 1988, which threatened an unnamed tributary to the Schuylkill River. Briefly, a spill occurred during the unloading of product raw material which was discharged to a fire pond.

Due to immediate action by your Company, the material was prevented from ever reaching the nearby stream. More thoughtful and resourceful action was required to completely neutralize the spill and entirely mitigate the potential threat. This was done.

I would like to take this opportunity to thank you and your staff for the cooperation and action in dealing with the potentially serious spill. Specifically, Mr. Edward A. Strauch, Jr. merits special commendation for his action, courtesy and assistance in abatement.

The Department of Environmental Resources values industrial neighbors with the wherewithal and environmental conscience to effectively deal with emergencies. This is an enviable reflection of your Company presented to industry and the community that others would do well to emulate when the need arises.

Very truly yours,

RALPH W. COOK III
Water Quality Specialist

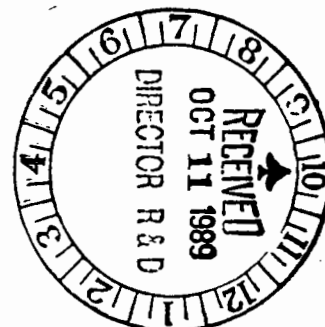
cc: Re30 RC16.2



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

Reading District Office

625 Cherry Street
Reading, PA 19602
215-378-4175



October 10, 1989

Mr. David Cusumano
Kiwi Brands Incorporated
Route 662*
Douglassville, PA 19518

Re: Neodol 25-7 Spill Remediation
Amity Township, Berks County

Dear Mr. Cusumano:

This letter is in response to your letter of July 25, 1989 and the follow-up meeting held at Kiwi Brands on September 25, 1989. Kiwi has demonstrated to the Department's satisfaction that the neodol 25-7 spill has been sufficiently remediated through the temporary storage of affected pond sludge and biodegradation of the neodol 25-7.

Therefore the Department grants approval to Kiwi to empty and dismantle the temporary pond sludge holding area as discussed at our meeting. Erosion of the disturbed areas should be controlled until vegetation can be established.

If you have any questions please feel free to contact me at 215-861-2070 or 215-378-4175.

Very truly yours,

MICHAEL MAIOLIE
Field Operations Supervisor

cc: Norristown Regional File
Reading District File
Mr. Zwalinski
Re30 MM6.1


KIWI BRANDS INC.
Division of Sara Lee Corporation

RT. 662, DOUGLASSVILLE, PA 19518 • PHONE: (215) 385-3041 • FAX: (215) 385-6177 • TELEX: 846384

20 September 1989

Michael Maiolie
Waste Management Specialist
PENNSYLVANIA DEPARTMENT OF ENV. RESOURCES
625 Cherry St.
Reading, Pa. 19606

Dear Mike:

I am forwarding to you the results of the recovery well testing at Kiwi Brands Inc. We had an overfill during a delivery of mineral spirits into our underground tank #3 on 29 January 1988. As a result, approximately 700 gallons mineral spirits spilled onto the ground. Remedial action included collection of any recoverable mineral spirits, excavation of approximately 120 tons of contaminated soil, and installation of three recovery wells to the depth of the bottom of the storage tanks. The incident report dated 12 February 1988, which we sent to you, fully describes our response activities.

Initially, water collected from the recovery wells was passed through a 400 gallon decanting tank to collect supernatant solvent. This was performed regularly for the first three months until no observable supernatant solvent was being removed. Henceforth, we would pump water from each of the wells into our wastewater system to remove residual solvent.

Well testing was performed every six months to monitor the residual solvent level. To prepare for the well testing, standing water was removed from each well by pumping for one-half hour at 35 gpm or until the wells were emptied. A representative of RMC Environmental Labs would sample each well. As we agreed to do, the total petroleum hydrocarbon level was analyzed by method 418.1.

The test results were as follows:

Dec 1/89

Letter to Michael Mailolie
Page 2
20 September 1989

Method 418.1 - Total Petroleum Hydrocarbon (MG/L) - *ppm*

Sample Date	Well #1	Well #2	Well #3
7/28/88	2.0	4.0	<1.8
12/29/88	<0.82	29.4 *	9.21 *
7/28/89	--	<0.87	<0.92

* RMC Environmental Labs offered the following explanation for the elevated levels in these samples:

The levels of total petroleum hydrocarbons found in the most recent sampling of KIWI wells were higher than those reported in the past. It was noted by Richard Sichler, RMC's Senior Hydrogeologist, that the samples were extremely turbid from silt. It is possible that the elevated levels were caused by the extraction of hydrocarbons which had adhered to the silt particles. The reported values were higher because they included both the hydrocarbons dissolved in the water and the hydrocarbons which had adhered to the silt particles.

Since we have achieved the initial objectives for remedial action and monitoring, we would like to consider this project to be complete. Unless you feel otherwise, we do not plan any further activities with the recovery wells. They will, of course, remain in place and are kept capped at all times.

Please contact me at (215) 385-9241 should you have any questions.

Sincerely,



Edward R. Strauch, Jr.
Manager, Analytical & Environmental Affairs

/ljb

Encl.

KIWI BRANDS INC.



INTER-OFFICE MEMORANDUM

4 May 1987

1.6.

From: E.R. Strauch

To: ~~E. A. Burke~~

SUBJECT: DISCUSSION WITH M. MAIOLIE (DER) RE EVAPORATOR TANK SLUDGE STATUS

As per my telephone conversation with M. Maiolie of the DER on 28 April 1987, ~~he considers administrative closure for the evaporator tanks to be complete.~~ he does not plan to send a followup letter since his prior closure plan acceptance letter is sufficient along with the two certification forms we sent to him. He does not feel we need a permit for the sludge now classified as industrial residual waste unless we dispose of it in Pennsylvania.

Also, he has not read our revised PPC Plan yet but will get back to us after doing so.

ERS

EDWARD R. STRAUCH

ERS/ep

RECEIVED
MAY 5 1987
R&D

NOV 1986
PENALTY FOR PA
USE \$200
L&L

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 PHONE: (215) 385-3041 CABLES: KIWI DOUGLASSVILLE • TELEX: 846384 • FAX: (215) 385-6177

18 September 1986

Mr. Michael Maiolie
Waste Management Specialist
DEPARTMENT OF ENVIRONMENTAL RESOURCES
625 Cherry Street
Reading, PA 19602

Dear Mr. Maiolie:

We have received your letter of 10 September 1986 approving our closure plan for a collection tank, two evaporator tanks, and the overflow tank adjacent to the two evaporating tanks. Enclosed are the following completed closure certification forms:

- 1) Professional Engineer Certification of Closure
- 2) Owner or Operator Certification of Closure

With the completion of these forms, it is our understanding that the administrative closure for the units is now complete.

Very truly yours,

EDWARD R. STRAUCH, JR.
Senior Analytical Chemist

ERS/ep

Enclosures

PROFESSIONAL ENGINEER CERTIFICATION OF CLOSURE

I, JOHN JOSEPH ORANSKY, a Professional Engineer registered
(Name)

pursuant to the Professional Engineers Registration Law, 63 P.S. §§148 et seq., hereby
certify that I have reviewed the Closure Plan for the STORAGE FACILITY at
(Type of Facility)

KIWI BRANDS INC. ("facility"), located
(Name of Hazardous Waste Facility)

at ROUTE 662 NORTH, DOUGLASSVILLE, PA. 19518
(Location)

that I am familiar with the rules and regulations of the Pennsylvania Department of
Environmental Resources pertaining to closure of such facility, and that I personally have
made visual inspection(s) of the aforementioned facility, and that the closure of the
aforementioned facility has been performed in full and complete accordance with the
facility's closure plan approved in writing by the Department of Environmental Resources on
September 10, 1986, and the rules and regulations of the Department
codified at 25 Pa. Code Chapter 75.

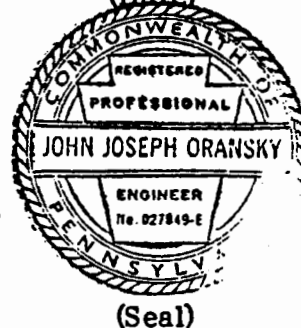
John Joseph Oransky
(Signature)

SEPT. 10, 1986
(Date)

027849-E
(Professional Engineering License Number)

SPOTTS, STEVENS & MCCOY, INC.
345 N. WYOMISSING BLVD. PO BOX 6307
(Business Address)

215-376-6581
(Telephone Number)



(Seal)

OWNER OR OPERATOR CERTIFICATION OF CLOSURE

The undersigned, Kiwi Brands Inc., a (1) Corporation,
(Name of Owner or Operator)
Incorporated under the laws in the State of Pennsylvania and licensed to do business in
Pennsylvania, or (2) _____,
(Partnership, Individual, Municipality or Other Entity)
with its principal place of business at Route 662 North, Douglassville, which
(Address)
formerly owned or operated a hazardous waste storage facility
(Description of Hazardous Waste Activity)
(hereinafter "Facility") known as Kiwi Brands Inc. and
(Name of Hazardous Waste Facility)
located at Route 662 North, Douglassville
(Location)
in Berks County, Pennsylvania, has completed and permanently ceased the
active operation of the facility and has fully implemented all measures relating to the
closure of the facility as set forth in the Closure Plan approved by the Pennsylvania
Department of Environmental Resources for said facility.

NOW, THEREFORE, I (we) Kiwi Brands Inc.
(Name of Owner/Operator)

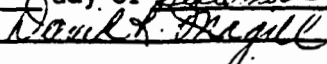
hereby swear and affirm that the above-named hazardous waste facility has been closed in
accordance with the facility's Closure Plan approved in writing by the Department on
10 September, 1986, that all measures relating to the closure of the facility required
by the Closure Plan and the rules and regulations of the Department codified at 25 Pa. Code
Chapter 75 have been fully implemented, and that to the best of my (our) knowledge, no
violations continue to exist that may have arisen prior to closure.


(Signature)

Vice President - Finance
(Title)

Route 662 North, Douglassville, PA 19518
(Address)

Taken, sworn and subscribed before me, this
15th day of September A.D. 1986



(Notary)

DAVID R. MAGILL, Notary Public
Douglassville, Berks County
My Commission Expires Aug. 23, 1987



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
Reading District Office
625 Cherry Street
Reading, Pennsylvania 19602
215-378-4175

September 10, 1986

Kiwi Brands Inc.
Attention: Peter A Burke, Ph.D.
Route 662, North
Douglassville, PA 19518

Re: Closure Plan for Facility
PAD 097153399
Amity Township, Berks County

Dear Mr. Burke:

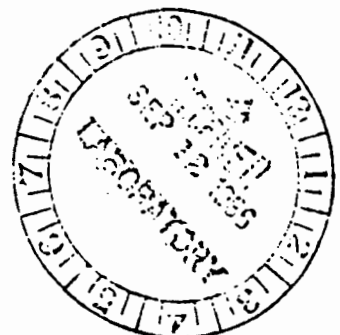
The Department received a hazardous waste closure plan for your facility on July 30, 1986, to remove a collection tank, two evaporator tanks and the overflow tank adjacent to the two evaporator tanks from the hazardous waste system. On August 19, 1986, an inspection of the above referenced units was conducted and it was determined that an additional sample should be collected from your overflow tank. This analysis dated August 21, 1986, along with the previously submitted analyses, confirm that the tanks have been adequately decontaminated.

This letter is to approve the closure plan and related closure activities which have already occurred at your facility. Once the closure certification forms have been received at this office, closure of the above referenced units will be considered complete. If you have any other questions concerning this matter, please feel free to contact me at the above number.

Very truly yours,

MICHAEL MAIOLIE
Waste Management Specialist

cc: Norristown Regional Office
Reading District Office



ANALYTICAL REPORT

CLIENT: Kiwi Brands
Route 662 & Old Swede Roads
Douglassville PA 19518

PROJECT: 110817
PO NO: .
REPORTED: 10-FEB-92
RECEIVED: 05-FEB-92
WORK ORDER: 4129-005

REPORT TO: Dave Stanislawczyk
SSM/Spotts, Stevens and McCoy, Inc.

PROJECT DESCRIPTION: Mineral Spirit Wells Groundwater

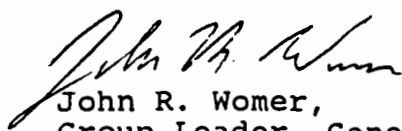
SAMPLING DATE: 05-FEB-92 TIME: 10:30 BY: Michael J. Bendetti

	UNITS	RESULT
SAMPLE: 1042007		
MW-1 Water		
Total Petroleum Hydrocarbons	mg/l -ppm	< 2.0
SAMPLE: 1042008		
MW-2 Water		
Total Petroleum Hydrocarbons	mg/l	< 2.0
SAMPLE: 1042009		
MW-3 Water		
Total Petroleum Hydrocarbons	mg/l	< 2.0

The sample was analyzed by EPA Method 418.1.

< Indicates less than the limit of quantitation.

Respectfully submitted,


John R. Womer,
Group Leader, General Chemistry



REQUEST FOR LABORATORY
ANALYTICAL SERVICES

Client Name: KIWI BRANDS

Address: _____

Spotts, Stevens & McCoy
Report to: DAVE STANISLAWCZYK

P.O. No: _____

W.O. No: 4129-005

Phone Report Requested: _____

FAX Report: _____

Requested Reporting Date: _____

Lab Approval: _____

Priority charges authorized by
client: _____

Project Description: MINERAL SPIRIT WELLS Sampled For: MTB Date/Time: 6/11/91 1345

CLIENT SAMPLE ID	# OF CONTAINERS	SAMPLE DESCRIPTION	ANALYSIS REQUESTED
<u>MW 1</u>	<u>1</u>	<u>Water</u>	<u>TPH</u>
<u>MW 3</u>	<u>1</u>	<u>"</u>	<u>↓</u>

CHAIN OF CUSTODY

Delivery to laboratory
Custody relinquished by: Michael J. Benketh
To: _____ Date: 6/11/91 Time: _____

Intralaboratory Transfer
Custody relinquished by: _____
To: _____ Date: _____ Time: _____

Custody relinquished by: _____
To: _____ Date: _____ Time: _____

Custody relinquished by: _____
To: _____ Date: _____ Time: _____

Custody relinquished by: _____
To: _____ Date: _____ Time: _____

Comments/Special Requests MW 2 did not contain enough water to analyze.

ANALYTICAL REPORT

CLIENT: Kiwi Brands
Route 662 & Old Swede Roads
Douglassville PA 19518

PROJECT: 105911
PO NO:
REPORTED: 28-JUN-91
RECEIVED: 18-JUN-91
WORK ORDER: 4129-005

REPORT TO: Dave Stanislawczyk
SSM/Spotts, Stevens and McCoy, Inc.

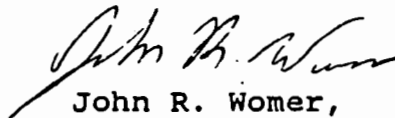
PROJECT DESCRIPTION: Mineral Spirit Wells

SAMPLING DATE: 18-JUN-91 TIME: 13:45 BY: MJB

	UNITS	RESULT
SAMPLE: 1022455		
MW 1 Water		
Total Petroleum Hydrocarbons	mg/l	< 2
SAMPLE: 1022456		
MW 3 Water		
Total Petroleum Hydrocarbons	mg/l	2.9

< Indicates less than the limit of detection.

Respectfully submitted,



John R. Womer,
Group Leader, General Chemistry



ENVIRONMENTAL
SERVICES

CERTIFICATE OF ANALYSIS

Tri-County Business Campus
88 Robinson Street
Pottstown, PA 19464
215 • 327 • 4850
215 • 327 • 4852 Fax

KIWI Brands
Rt. 662 North
Douglassville, PA 19518

RMC Number : 9397
Sample Description: WELL #1

Report No. : 903539
Sample Date: 12/19/90
Sampled By : DCF
Received : 12/19/90
Reported : 12/20/90
P.O. Number: N/A

Repl	Parameter	Result	Date Anl Completed	Ana- lyst	Method
1	TOT.PETROLEUM HYDROCARBONS (LIQUID)	<0.82 MG/L	12/20/90	RSL	EPA 418.1

Approved By:

Twila E. Dixon

Assistant Laboratory Manager



ENVIRONMENTAL
SERVICES

CERTIFICATE OF ANALYSIS

Tri-County Business
88 Robinson Street
Pottstown, PA 19464
215 • 327 • 4850
215 • 327 • 4852 FAX

KIWI Brands
Rt. 662 North
Douglassville, PA 19518

KHC Number : 9398
Sample Description: WELL #2

Report No. : 903539
Sample Date: 12/19/90
Sampled By : DCF
Received : 12/19/90
Reported : 12/20/90
P.O. Number: N/A

Repl	Parameter	Result	Date Anal Completed	Ana- lyst	Method
1	TOT.PETROLEUM HYDROCARBONS (LIQUID)	<0.82 MG/L	12/20/90	RSL	EPA 418.1

Approved By:

Twila E. Dixon

Twila E. Dixon
Assistant Laboratory Manager



ENVIRONMENTAL
SERVICES

CERTIFICATE OF ANALYSIS

Tri-County Business Campus
88 Robinson Street
Pottstown, PA 19464
215 • 327 • 4850
215 • 327 • 4852 Fax

KIWI Brands
Rt. 662 North
Douglassville, PA 19518

File Number : 90339
Sample Description: WELL #3

Report No. : 903539
Sample Date: 12/19/90
Sampled By : DCF
Received : 12/19/90
Reported : 12/20/90
P.O. Number: N/A

Repl	Parameter	Result	Date Anl Completed	Ana- lyst	Method
1	TOT.PETROLEUM HYDROCARBONS (LIQUID)	3.21 MG/L	12/20/90	RSL	EPA 418.1

Approved By:

Twila E. Dixon
Assistant Laboratory Manager



Tri-County Business
88 Robinson Street
Pottstown, PA 19464
215 • 327 • 4850
215 • 327 • 4852 FAX

Report No. : 902088
Sample Date: 08/21/90
Sampled By : DF
Received : 08/21/90
Reported : 08/28/90
P.O. Number: N/A

Repl	Parameter	Result	Date Anl Completed	Ana-lyst	Method
1	TOT.PETROLEUM HYDROCARBONS (LIQUID)	3.07 MG/L	08/27/90	RSL	EPA 418.1

Approved By:

Twila E. Dixon
Twila E. Dixon
Assistant Laboratory Manager



ENVIRONMENTAL
SERVICES

CERTIFICATE OF ANALYSIS

Tri-County Business Campus
88 Robinson Street
Pottstown, PA 19464
215 • 327 • 4850
215 • 327 • 4852 Fax

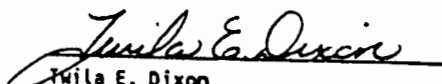
KIWI Brands
Rt. 662 North
Douglassville, PA 19518

RMC Number : 5826
Sample Description: WELL #3

Report No. : 902088
Sample Date: 08/21/90
Sampled By : DF
Received : 08/21/90
Reported : 08/28/90
P.O. Number: N/A

Repl	Parameter	Result	Date Anal Completed	Ana- lys	Method
1	TOT. PETROLEUM HYDROCARBONS (LIQUID)	17.8 MG/L	08/27/90	RSL	EPA 418.1

Approved By:


Twila E. Dixon
Assistant Laboratory Manager

Appendix B
Support Documentation

Appendix B -
Part A
Documents Obtained During File Review

Table of Contents

Appendix B Part A Documents Obtained During File Review

- Correspondences between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated April 8, 1986:
Subject: Letter requesting delisting of the Kiwi facility from hazardous storer/treater status.
- Correspondence between Kiwi Brands, Inc. and USEPA dated May 7, 1986:
Subject: Additional information for the RCRA Part B application.
- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated September 10, 1986:
Subject: Approval letter for the closure of a collection tank, two evaporator tanks, and an overflow tank.
- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated September 18, 1986:
Subject: Closure certification forms for a collection tank, two evaporator tanks, and the overflow tank.
- RCRA Prioritization System Scoring Summary for the Kiwi facility, dated October 30, 1991.
- Hazardous Waste Inspection Report Generators – Part A dated September 18, 1996.

free

KIWI POLISH
KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 • PHONE: (215) 385-3041 • CABLES: KIWI DOUGLASSVILLE • TELEX: 846384 • FAX: (215) 385-6177

8 April 1986

RECEIVED
PA SECTION

JUN 17 1986

EPA, R3

Division of Hazardous Waste Management
Bureau of Solid Waste Management
Commonwealth of Pennsylvania
Department of Environmental Resources
P. O. Box 2063
Harrisburg, Pennsylvania 17120

REFERENCE: PAD097153399

Gentlemen:

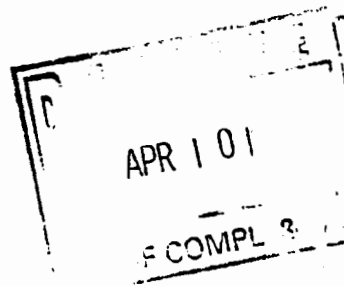
Since our initial filing as storer/treater of hazardous waste in a concrete evaporative tank, changes in our manufacturing operation have caused the material to become non-hazardous. The only hazard associated with the original sludge was the accumulation of an organo-metallic compound which was EP toxic due to the presence of mercury. Analysis of the waste stream during the course of operation demonstrate that the waste was never EP toxic since the EP toxic leachate demonstrated less than .2 ppm. Nevertheless, we have continued to manifest the waste as hazardous as a conservative position in accordance with the RCRA regulations. Reformulation of our products has eliminated this organo-mercuric compound and, therefore, this sludge no longer constitutes EP toxic waste.

*Coded
8/18/86*

To support this position, please find enclosed copies of recent laboratory analyses of the sludge in the concrete evaporative tank demonstrating no EP toxic mercury.

In due course we hope to hear from you indicating a delisting of our facility as being a hazardous storer/treater.


Additionally, within the last year, our company name has been changed from The Kiwi Polish Company Pty. Ltd. to Kiwi Brands Inc.



Department of Environmental Resources
Page 2
8 April 1986

Thank you in advance for your cooperation.

Yours truly,


Peter A. Burke, Ph.D.
Laboratory Manager

js

cc: M. G. Maiolie
PA Department of Environmental Resources
625 Cherry Street
Reading, PA 19602

Mr. Thomas Voltaggio
Acting Director, Enforcement Division
U.S.E.P.A.
Region III
6th and Walnut Streets
Phila., PA 19106

BUREAU OF SOLID WASTE MANAGEMENT
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

ER-SWM-53: Rev. 3/82

I INSTALLATION'S EPA I.D. NUMBER									
A D 0 9 7 1 5 3 3 9 9									
NAME OF INSTALLATION									
KIWI BRANDS INC.									
III INSTALLATION MAILING ADDRESS									
STREET OR P. O. BOX									
Route 662 North									
CITY OR TOWN								ST.	ZIP CODE
Douglassville								PA	19518
IV LOCATION OF INSTALLATION									
STREET OR ROUTE NUMBER								MUNICIPALITY	
Route 662 North								Douglassville	
CITY OR TOWN				ST.	ZIP CODE		COUNTY		
Douglassville				PA	19518		Berks		
V INSTALLATION CONTACT									
NAME AND TITLE (last, first, & job title)								PHONE NO. (area code & no)	
P. A. Burke, Laboratory Manager								215 385 304	
VI OWNERSHIP									
A. NAME OF INSTALLATION'S LEGAL OWNER									
Kiwi Brands Inc.									
B. TYPE OF OWNERSHIP									
(enter the appropriate letter into box)									
F = FEDERAL M = NON-FEDERAL M									
VII SIC CODES (4-digit in order of priority)									
A. FIRST					C. THIRD				
(specify) NONE					(specify) NONE				
B. SECOND					D. FOURTH				
(specify) NONE					(specify) NONE				
VIII TYPE OF HAZARDOUS WASTE ACTIVITY									
<input type="checkbox"/> A. GENERATION		<input type="checkbox"/> C. STORE		<input type="checkbox"/> E. TRANSPORTATION (COMPLETE ITEM IX)		<input type="checkbox"/> G. REUSE, RECYCLE, RECLAIM			
<input type="checkbox"/> B. TREAT		<input type="checkbox"/> D. DISPOSE		<input type="checkbox"/> F. PERMIT BY RULE		<input checked="" type="checkbox"/> H. OTHER (specify): NONE			
IX MODE OF TRANSPORTATION (transporters only)									
<input type="checkbox"/> A. AIR		<input type="checkbox"/> B. RAIL		<input type="checkbox"/> C. HIGHWAY		<input type="checkbox"/> D. WATER		<input type="checkbox"/> E. OTHER (specify):	
X EXISTING ENVIRONMENTAL PROGRAM PERMITS									
A. NPDES (Discharges to Surface Water)				D. PSD (Air Emissions from Proposed Sources)				<div style="border: 1px solid black; padding: 5px; text-align: center;">APR 10 1986</div>	
B. UIC (Underground Injection of Fluids)				E. SOLID WASTE					
C. RCRA (Hazardous Wastes)				F. OTHER					
(specify) NONE - Just E.P.A. ID. NO.									
XI. TYPE OF NOTIFICATION.									
<p>Mark "X" in appropriate box to indicate whether this is your installation's first notification of hazardous waste activity, or notification of change in general information, hazardous waste handled, or hazardous waste activity. If you check B, C, D, E, or F, attach a letter of explanation (SEE INSTRUCTIONS).</p> <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> A. FIRST NOTIFICATION <input checked="" type="checkbox"/> B. CHANGE OF GENERAL INFORMATION </div> <div> <input type="checkbox"/> C. DELETION OF A WASTE <input type="checkbox"/> D. ADDITION OF A WASTE </div> <div> <input type="checkbox"/> E. DELETION OF AN ACTIVITY <input type="checkbox"/> F. ADDITION OF AN ACTIVITY </div> </div>									

CONTINUE ON REVERSE

DESCRIPTION OF HAZARDOUS WASTES (Continued from front) NONE

HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from §75.261(h)(2) for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from §75.261(h)(3) each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from §75.261(h)(4) for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See §75.261(g)(2) through (5))

☐ 1. IGNITABLE

☐ 2. CORROSIVE

☐ 3. REACTIVE

☐ 4. EP TOXIC

XIII CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

[Signature]

NAME and OFFICIAL TITLE (Type or Print)
Laboratory Manager

DATE SIGNED

3/30/88

FOR OFFICIAL USE ONLY

CERTIFICATE OF ANALYSIS

LABORATORY NO: See Below

RECEIVED: 24 Sep 1985

REPORTED: 31 Oct 1985

CLIENT: Kiwi Brands, Inc.
Route 662 North
Douglassville, PA 19518

Sample Date: 8/29/85 and 9/24/85
Sampled By: John Hughes

SAMPLE DESCRIPTION:

Parameter	Units	Total Analysis*			Units	E.P. Toxicity Leachate Analysis		
		9-24-85-N-SP RMC#2522-85	9-24-85-N RMC#2523-85	8-29-85-S RMC#2524-85		9-24-85-N-SP RMC#2522-85	9-24-85-N RMC#2523-85	8-29-85-S RMC#2524-85
Mercury, Total	mg/kg	515	0.20	0.60	mg/l	20	0.004	0.012

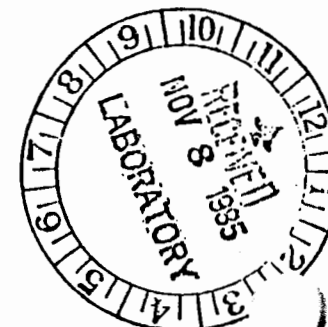
*As Received

Approved By:

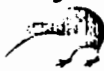
Kyle F. Gross
Kyle F. Gross, Supervisor
Environmental Chemistry Laboratory

N = North Pit
S = South Pit
SP = Spiked

Sample 9-24-85-N-SP - same as 9-24-85-N only spiked
with approximately 500 ppm Hg (Troysan).



KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 • PHONE: (215) 385-3041 • CABLES: KIWI DOUGLASSVILLE • TELEX: 846384 • FAX: (215) 385-6177

9 April 1986

Mr. Thomas Voltaggio
Acting Director, Enforcement Division
U.S. Environmental Protection Agency
Region III
6th and Walnut Streets
Philadelphia, Pennsylvania 19106

REFERENCE: PAD097153399

Dear Mr. Voltaggio:

Please find enclosed a letter to the PA Department of Environmental Resources requesting delisting of our concrete evaporative tank from being a hazardous operation. In addition to the letter mentioned above, there are laboratory analyses to support this position as well as a change of notification of hazard activity as required by the D.E.R.

If you have any questions, please contact me.

Yours truly,

Peter A. Burke, Ph.D.
Laboratory Manager

js

cc: Commonwealth of Pennsylvania
Department of Environmental Resources
P. O. Box 2063
Harrisburg, PA 17120

Enc:

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 • PHONE: (215) 385-3041 • CABLES: KIWI DOUGLASSVILLE • TELEX: 846384 • FAX: (215) 385-6177

7 May 1986

RECEIVED
EPA

MAY 13 1986
MAY 13 1986

EPA, R3
EPA, R3

Mr. Stephen R. Wassersug, Director
Hazardous Waste Management Division
U.S.E.P.A.
Region III
841 Chestnut Building
Philadelphia, PA 19107

REFERENCE: PAD097153399

Your letter received 24 April 1986, 3HW33

Dear Mr. Wassersug:

Pursuant to your request for the required Part B application under RC regulations for finalization of interim status for treater/storer facility, please find enclosed the following information:

1. On April 8, 1986 we wrote to the Department of Environmental Resources, Commonwealth of PA with a copy to Mr. Thomas Voltaggio, U.S.E.P.A., indicating that we wish to delist our facility as treater/storer of hazardous waste since the organo-mercuric compound that constituted the sludge as being hazardous waste has been eliminated as a waste stream.
2. Also attached please find a Notification of Hazardous Waste Activity form which was filed at the same time and updated on 6 May.
3. Finally, although we did file for interim status with regard to the organo-mercuric compound subsequent analyses of this sludge was found not to contain EP toxic leachate as demonstrated by analytical results from contract testing laboratories.

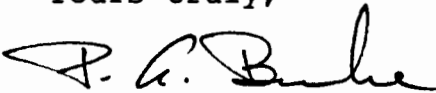
Mr. Stephen R. Wassersug, Director
Hazardous Waste Management Division
U.S.E.P.A.

Page 2

7 May 1986

Believe with this information it is not necessary for us to proceed with a formal permit application and request to be relinquished from these obligations as delineated in your letter received April 28.

Yours truly,

A handwritten signature in dark ink, appearing to read "P. A. Burke". The signature is fluid and cursive, with the first name "P." and last name "Burke" clearly distinguishable.

Peter A. Burke, Ph.D.
Laboratory Manager

js

Enclosures:



28 S. HANOVER STREET, POTTSTOWN, PA. 19464 215 / 327-0880
125 MAIN AVENUE, ELMWOOD PARK, N.J. 07407 201 / 791-6700

May 21, 1984

For KIWI
Rt. 662 North
Douglassville, Pa. 19518

Identification of Samples: 05-0484-17
Date Sampled 5/4 Time 9:30
Date Received 5/4 Time 2:25
Sampled By _____ Rec. by _____
Date Complete 5/17/84 Tested by Wastex

PARAMETER

RESULT

Total Mercury

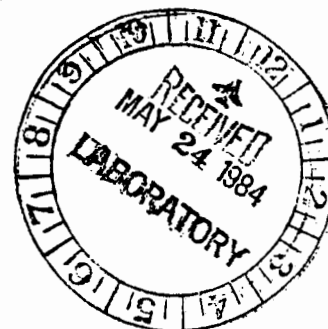
9.0 mg/kg

EP Toxic Mercury

.20 mg/l

Hex Chrome

.10 mg/l



Signature _____

[Handwritten signature]



28 S. HANOVER STREET POTTSTOWN, PA. 19464 215/327-0880

LAB# 04-3082-09

For The Kiwi Polish Company Pty, Ltd.
Douglassville, PA 19518

Attn: Ed Strauch

P.O. # _____

EPA License 38-005 MIO

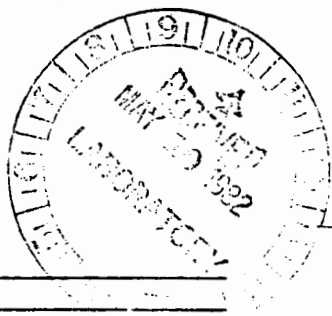
Penna. Dept. of Health License 148-B

Date Sampled: 4/30/82

Sampled By: Customer

Date Completed: 5/7/82

Tested By: Wastex



Identification of Samples:

1. North side - Sludge

2. South side - Sludge

3. _____

4. _____

Class of Sample: ☐ Grab ☐ Grab Composite ☐ Continuous

Analysis	#1	#2	#3	#4	Analysis	#1	#2	#3	#4
BOD (5 day 20°C) mg/l					METALS				
COD mg/l					Arsenic mg/l				
Dissolved Oxygen mg/l					Barium mg/l				
TOC mg/l					Cadmium mg/l				
Relative Stability					Calcium mg/l				
Acidity mg/l CaCO ₃					Chromium mg/l				
Alkalinity mg/l CaCO ₃					Copper mg/l				
Hardness mg/l CaCO ₃					Iron mg/l				
pH					Lead mg/l				
Spec Cond. μ mhos/cm					Magnesium mg/l				
Specific Gravity					Mercury mg/l (Total)	128.	177.2		
Color					Selenium mg/l				
Odor					Silver mg/l				
Turbidity					BACTERIOLOGICAL				
Bromide mg/l					St. Plate Count No/ml				
Chloride mg/l					Total Coliform No/100ml				
Chlorine-Residual mg/l					Fecal Coliform No/100ml				
Cyanide mg/l					Streptococcus				
Fluoride mg/l					Staphylococcus				
Ammonia Nitrogen mg/l					Salmonella				
Nitrate Nitrogen mg/l					E. Coli				
Nitrite Nitrogen mg/l					Yeasts and Molds				
Organic Nitrogen mg/l					OTHER				
Total Phosphate as P mg/l					Mercury (EP toxicity)	.019	.0003		
Orthophosphate as P mg/l									
Silica mg/l									
Sulfate mg/l									
Sulfide mg/l									
Sulfite mg/l									
Total Solids mg/l									
Dissolved Solids mg/l									
Suspended Solids mg/l									
Settleable Solids mg/l									
Filterable Solids mg/l									
Grease and Oil mg/l									
Detergents mg/l									
Phenols mg/l									

Ed Strauch

WASTE CONVERSION INC.

2869 Sandstone Drive / Hatfield, Pennsylvania 19440 / 215-822-8996

Waste Generator: Kiwi Polish Company, PTY-LTD.

Waste Identification: Semi-Solid Wastewater Sludge

Lab Code: 1034

Test Parameter	Total Analysis	L/P Leachate
Total Residue	26.1%	0.6%
Total Dissolved Solids	9.2%	0.6%
Total Volatile Solids	3.5%	< 0.1%
pH	9.2	4.3
Cyanides	88.5 mg/Kg	9 mg/L
Oil & Grease	11.3 mg/Kg	449 mg/L
Ammonia, N	226.3 mg/Kg	11.2 mg/L
Phenol	684 mg/Kg	39.2 mg/L
Arsenic	2.8 mg/Kg	0.017 mg/L
Antimony	N/A	< 0.1 mg/L
Barium	13.6 mg/Kg	0.15 mg/L
Cadmium	30.5 mg/Kg	0.091 mg/L
Chromium	4.5 mg/Kg	0.04 mg/L
Lead	28.8 mg/Kg	0.248 mg/L
Mercury	1.4 mg/Kg	0.037 mg/L
Nickel	18.2 mg/Kg	0.28 mg/L
Selenium	1.8 mg/Kg	0.001 mg/L
Silver	< 4.5 mg/Kg	0.02 mg/L
Copper	< 4.5 mg/Kg	0.18 mg/L
Molybdenum	< 4.5 mg/Kg	0.01 mg/L
Zinc	11.4 mg/Kg	3.64 mg/L
Heating Value	N/A	
Ignitability	N/A	
Corrosivity	Waste is <u>NOT</u> Corrosive, per 75.261 g 3.	
Reactivity	Waste is <u>NOT</u> Reactive, per 75.261 g 4.	
Total Organic Halogens	N/A	
COD	4,775 mg/L	
TOC	31,260 mg/L	

DATE: 5/7/82

ANALYSIS COMPLETED BY: B. J. Emlen

file

KIWI BRANDS INC.

RT. 662 NORTH, DOUGLASSVILLE, PA 19518 • PHONE: (215) 385-3041 • CABLES: KIWI DOUGLASSVILLE • TELEX: 846384 • FAX: (215) 385-6177

7 May 1986

Division of Hazardous Waste Management
Bureau of Solid Waste Management
Commonwealth of Pennsylvania
Department of Environmental Resources
P. O. Box 2063
Harrisburg, Pennsylvania 17120

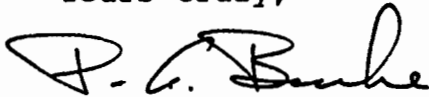
REFERENCE: PAD097153399

Gentlemen:

In reviewing our letter of 8 April 1986 requesting a change in hazardous waste status by requesting our facility be declassified as a storer of hazardous waste, we have noted than an error was committed in finalizing the Notification of Hazardous Waste Activity form.

To be specific, in description of hazardous waste, Section 12, Part A, our activities were listed as none. This is not entirely correct since we do generate some hazardous wastes which are designated by EPA code F001 and F005 as well as ignitable materials. However, these materials are not stored nor treated but are merely generated and properly disposed of within the permissible 90-day period. Therefore, would you please update our file with the enclosed Notification of Hazardous Waste Activity form which has the specific listings.

Yours truly,



Peter A. Burke, Ph.D.
Laboratory Manager

js

cc:

Mr. G. Maiolie
PA Dept. of Env. Resources
625 Cherry St.
Reading, PA 19602

Mr. Thomas Voltaggio
Acting Director
U.S.E.P.A.
Region III
6th and Walnut Streets
Phila., PA 19106

BUREAU OF SOLID WASTE MANAGEMENT
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

ER-SWM-53: Rev. 3/82

I. INSTALLATION'S EPA I.D. NUMBER									
A	D	0	9	7	1	5	3	3	9
II. NAME OF INSTALLATION									
Kiwi Brands Inc.									
III. INSTALLATION MAILING ADDRESS									
STREET OR P. O. BOX									
Route 662 North									
CITY OR TOWN								ST.	ZIP CODE
Douglassville								PA	19518
IV. LOCATION OF INSTALLATION									
STREET OR ROUTE NUMBER								MUNICIPALITY	
Route 662 North									
CITY OR TOWN								ST.	ZIP CODE
Douglassville								PA	19518
								COUNTY	
								Berks	
V. INSTALLATION CONTACT									
NAME AND TITLE (last, first, & job title)								PHONE NO. (area code & no.)	
P.A. Burke, Laboratory Manager								215-385-3041	
VI. OWNERSHIP									
A. NAME OF INSTALLATION'S LEGAL OWNER									
Kiwi Brands Inc.									
B. TYPE OF OWNERSHIP									
(enter the appropriate letter into box)									
F = FEDERAL M = NON-FEDERAL M									
VII. SIC CODES (4-digit in order of priority)									
A. FIRST					C. THIRD				
(specify) None					(specify) None				
B. SECOND					D. FOURTH				
(specify) None					(specify) None				
VIII. TYPE OF HAZARDOUS WASTE ACTIVITY									
<input checked="" type="checkbox"/> A. GENERATION <input type="checkbox"/> C. STORE <input type="checkbox"/> E. TRANSPORTATION (COMPLETE ITEM IX) <input type="checkbox"/> G. REUSE, RECYCLE, RECLAIM <input type="checkbox"/> B. TREAT <input type="checkbox"/> D. DISPOSE <input type="checkbox"/> F. PERMIT BY RULE <input type="checkbox"/> H. OTHER (specify):									
IX. MODE OF TRANSPORTATION (transporters only)									
<input type="checkbox"/> A. AIR <input type="checkbox"/> B. RAIL <input type="checkbox"/> C. HIGHWAY <input type="checkbox"/> D. WATER <input type="checkbox"/> E. OTHER (specify):									
X. EXISTING ENVIRONMENTAL PROGRAM PERMITS									
A. NPDES (Discharges to Surface Water)					D. PSD (Air Emissions from Proposed Sources)				
B. UIC (Underground Injection of Fluids)					E. SOLID WASTE				
C. RCRA (Hazardous Wastes)					F. OTHER				
					(specify)				
					None - Just EPA ID No.				
XI. TYPE OF NOTIFICATION									
Mark "X" in appropriate box to indicate whether this is your installation's first notification of hazardous waste activity, or notification of general information, hazardous waste handled, or hazardous waste activity. If you check B, C, D, E, or F, attach a letter of explanation (SEE INSTRUCTIONS).									
<input type="checkbox"/> A. FIRST NOTIFICATION <input checked="" type="checkbox"/> C. DELETION OF A WASTE <input type="checkbox"/> E. DELETION OF AN ACTIVITY <input checked="" type="checkbox"/> B. CHANGE OF GENERAL INFORMATION <input type="checkbox"/> D. ADDITION OF A WASTE <input type="checkbox"/> F. ADDITION OF AN ACTIVITY									

CONTINUE ON REVERSE

XII DESCRIPTION OF HAZARDOUS WASTES (Continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from §75.261(h)(2) for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 00 1	2 F 00 5	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from §75.261(h)(3) each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from §75.261(h)(4) for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See §75.261(g)(2) through (5))

☒ 1. IGNITABLE
 ☐ 2. CORROSIVE
 ☐ 3. REACTIVE
 ☐ 4. EP TOXIC

XIII CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

P.A. Burke

NAME and OFFICIAL TITLE (Type or Print)

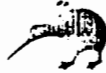
P.A. Burke
Laboratory Manager

DATE SIGNED

5/7/86

FOR OFFICIAL USE ONLY

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 • PHONE: (215) 385-3041 • CABLES: KIWI DOUGLASSVILLE • TELEX: 846384 • FAX: (215) 385-6177

8 April 1986

Division of Hazardous Waste Management
Bureau of Solid Waste Management
Commonwealth of Pennsylvania
Department of Environmental Resources
P. O. Box 2063
Harrisburg, Pennsylvania 17120

REFERENCE: PAD097153399

Gentlemen:

Since our initial filing as storer/treater of hazardous waste in a concrete evaporative tank, changes in our manufacturing operation have caused the material to become non-hazardous. The only hazard associated with the original sludge was the accumulation of an organo-metallic compound which was EP toxic due to the presence of mercury. Analysis of the waste stream during the course of operation demonstrate that the waste was never EP toxic since the EP toxic leachate demonstrated less than .2 ppm. Nevertheless, we have continued to manifest the waste as hazardous as a conservative position in accordance with the RCRA regulations. Reformulation of our products has eliminated this organo-mercuric compound and, therefore, this sludge no longer constitutes EP toxic waste.

To support this position, please find enclosed copies of recent laboratory analyses of the sludge in the concrete evaporative tank demonstrating no EP toxic mercury.


In due course we hope to hear from you indicating a delisting of our facility as being a hazardous storer/treater.

Additionally, within the last year, our company name has been changed from The Kiwi Polish Company Pty. Ltd. to Kiwi Brands Inc.

Department of Environmental Resources
Page 2
8 April 1986

Thank you in advance for your cooperation.

Yours truly,


Peter A. Burke, Ph.D.
Laboratory Manager

js

cc: M. G. Maiolie
PA Department of Environmental Resources
625 Cherry Street
Reading, PA 19602

Mr. Thomas Voltaggio
Acting Director, Enforcement Division
U.S.E.P.A.
Region III
6th and Walnut Streets
Phila., PA 19106

BUREAU OF SOLID WASTE MANAGEMENT
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

ER-SWM-53: Rev. 3/82

I. INSTALLATION'S EPA I.D. NUMBER									
A D 0 9 7 1 5 3 3 9 9									
II. NAME OF INSTALLATION									
KIWI BRANDS INC									
III. INSTALLATION MAILING ADDRESS									
STREET OR P. O. BOX									
Route 662 North									
CITY OR TOWN								ST.	ZIP CODE
Douglassville								PA	19518
IV. LOCATION OF INSTALLATION									
STREET OR ROUTE NUMBER								MUNICIPALITY	
Route 662 North								Douglassville	
CITY OR TOWN								ST.	ZIP CODE
Douglassville								PA	19518
								COUNTY	
								Berks	
V. INSTALLATION CONTACT									
NAME AND TITLE (last, first, & job title)								PHONE NO. (area code & no.)	
P. A. Burke, Laboratory Manager								215 385 304	
VI. OWNERSHIP									
A. NAME OF INSTALLATION'S LEGAL OWNER									
Kiwi Brands Inc.									
B. TYPE OF OWNERSHIP									
(enter the appropriate letter into box)									
F = FEDERAL M = NON-FEDERAL M									
VII. SIC CODES (4-digit in order of priority)									
A. FIRST					C. THIRD				
(specify) NONE					(specify) NONE				
B. SECOND					D. FOURTH				
(specify) NONE					(specify) NONE				
VIII. TYPE OF HAZARDOUS WASTE ACTIVITY									
<input type="checkbox"/> A. GENERATION <input type="checkbox"/> C. STORE <input type="checkbox"/> E. TRANSPORTATION (COMPLETE ITEM IX) <input type="checkbox"/> G. REUSE, RECYCLE, RECLAIM <input type="checkbox"/> B. TREAT <input type="checkbox"/> D. DISPOSE <input checked="" type="checkbox"/> F. PERMIT BY RULE <input checked="" type="checkbox"/> H. OTHER (specify): NONE									
IX. MODE OF TRANSPORTATION (transporters only)									
<input type="checkbox"/> A. AIR <input type="checkbox"/> B. RAIL <input type="checkbox"/> C. HIGHWAY <input type="checkbox"/> D. WATER <input type="checkbox"/> E. OTHER (specify):									
X. EXISTING ENVIRONMENTAL PROGRAM PERMITS									
A. NPDES (Discharges to Surface Water)					D. PSD (Air Emissions from Proposed Sources)				
B. UIC (Underground Injection of Fluids)					E. SOLID WASTE				
C. RCRA (Hazardous Wastes)					F. OTHER (specify)				
					NONE - Just E.P.A. ID. NO.				

I. TYPE OF NOTIFICATION

Mark "X" in appropriate box to indicate whether this is your installation's first notification of hazardous waste activity, or notification of a change of general information, hazardous waste handled, or hazardous waste activity. If you check B, C, D, E, or F, attach a letter of explanation (SEE INSTRUCTIONS).

- | | | |
|--|--|---|
| <input type="checkbox"/> A. FIRST NOTIFICATION | <input checked="" type="checkbox"/> C. DELETION OF A WASTE | <input type="checkbox"/> E. DELETION OF AN ACTIVITY |
| <input checked="" type="checkbox"/> B. CHANGE OF GENERAL INFORMATION | <input type="checkbox"/> D. ADDITION OF A WASTE | <input type="checkbox"/> F. ADDITION OF AN ACTIVITY |

CERTIFICATE OF ANALYSIS

LABORATORY NO: See Below

RECEIVED: 24 Sep 1985

REPORTED: 31 Oct 1985

CLIENT: Kiwi Brands, Inc.
Route 662 North
Douglassville, PA 19518

Sample Date: 8/29/85 and 9/24/85
Sampled By: John Hughes

SAMPLE DESCRIPTION:

Parameter	Units	Total Analysis*			Units	E.P. Toxicity Leachate Analysis		
		9-24-85-N-SP RMC#2522-85	9-24-85-N RMC#2523-85	8-29-85-S RMC#2524-85		9-24-85-N-SP RMC#2522-85	9-24-85-N RMC#2523-85	8-29-85-S RMC#2524-85
Mercury, Total	mg/kg	515	0.20	0.60	mg/l	20	0.004	0.012

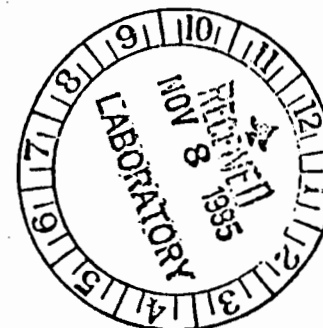
*As Received

Approved By: Kyle F. Gross

Kyle F. Gross, Supervisor
Environmental Chemistry Laboratory

N = North Pit
S = South Pit
SP = Spiked

Sample 9-24-85-N-SP - same as 9-24-85-N only spiked
with approximately 500 ppm Hg (Troysan).



KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 • PHONE: (215) 385-3041 • CABLES: KIWI DOUGLASSVILLE • TELEX: 846384 • FAX: (215) 385-6177

9 April 1986

Mr. Thomas Voltaggio
Acting Director, Enforcement Division
U.S. Environmental Protection Agency
Region III
6th and Walnut Streets
Philadelphia, Pennsylvania 19106

REFERENCE: PAD097153399

Dear Mr. Voltaggio:

Please find enclosed a letter to the PA Department of Environmental Resources requesting delisting of our concrete evaporative tank from being a hazardous operation. In addition to the letter mentioned above, there are laboratory analyses to support this position as well as a change of notification of hazard activity as required by the D.E.R.

If you have any questions, please contact me.

Yours truly,

Peter A. Burke, Ph.D.
Laboratory Manager

js

cc: Commonwealth of Pennsylvania
Department of Environmental Resources
P. O. Box 2063
Harrisburg, PA 17120

Enc:

Department of Environmental Resources

Reading District Office
625 Cherry Street
Reading, Pennsylvania 19602
215-378-6175

September 10, 1986

Kiwi Brands Inc.
Attention: Peter A Burke, Ph.D.
Route 662, North
Douglassville, PA 19518

Re: Closure Plan for Facility
PAD 097153399
Amity Township, Berks County

Dear Mr. Burke:

The Department received a hazardous waste closure plan for your facility on July 30, 1986, to remove a collection tank, two evaporator tanks and the overflow tank adjacent to the two evaporator tanks from the hazardous waste system. On August 19, 1986, an inspection of the above referenced units was conducted and it was determined that an additional sample should be collected from your overflow tank. This analysis dated August 21, 1986, along with the previously submitted analyses, confirm that the tanks have been adequately decontaminated.

This letter is to approve the closure plan and related closure activities which have already occurred at your facility. Once the closure certification forms have been received at this office, closure of the above referenced units will be considered complete. If you have any other questions concerning this matter, please feel free to contact me at the above number.

Very truly yours,

MICHAEL MAIOLIE
Waste Management Specialist

cc: Horristown Regional Office
Reading District Office

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 PHONE: (215) 385-3041 CABLES: KIWI DOUGLASSVILLE TELEX: 846384 FAX: (215) 385-6177

18 September 1986

Mr. Michael Maiolie
Waste Management Specialist
DEPARTMENT OF ENVIRONMENTAL RESOURCES
625 Cherry Street
Reading, PA 19602

RECEIVED
EPA REGION III

Dear Mr. Maiolie:

We have received your letter of 10 September 1986 approving our closure plan for a collection tank, two evaporator tanks, and the overflow tank adjacent to the two evaporating tanks. Enclosed are the following completed closure certification forms:

- 1) Professional Engineer Certification of Closure
- 2) Owner or Operator Certification of Closure

With the completion of these forms, it is our understanding that the administrative closure for the units is now complete.

Very truly yours,

EDWARD R. STRAUCH, JR.
Senior Analytical Chemist

ERS/ep

Enclosures

OWNER OR OPERATOR CERTIFICATION OF CLOSURE

The undersigned, Kiwi Brands Inc., a (1) Corporation,
(Name of Owner or Operator)
Incorporated under the laws in the State of Pennsylvania and licensed to do business in
Pennsylvania, or (2) _____,
(Partnership, Individual, Municipality or Other Entity)
with its principal place of business at Route 662 North, Douglassville, which
(Address)
formerly owned or operated a hazardous waste storage facility
(Description of Hazardous Waste Activity)
(hereinafter "Facility") known as Kiwi Brands Inc. and
(Name of Hazardous Waste Facility)
located at Route 662 North, Douglassville
(Location)

In Berks County, Pennsylvania, has completed and permanently ceased the
active operation of the facility and has fully implemented all measures relating to the
closure of the facility as set forth in the Closure Plan approved by the Pennsylvania
Department of Environmental Resources for said facility.

NOW, THEREFORE, I (we) Kiwi Brands Inc.
(Name of Owner/Operator)

hereby swear and affirm that the above-named hazardous waste facility has been closed in
accordance with the facility's Closure Plan approved in writing by the Department on
10 September, 1986, that all measures relating to the closure of the facility required
the Closure Plan and the rules and regulations of the Department codified at 25 Pa. Code
Chapter 75 have been fully implemented, and that to the best of my (our) knowledge, no
violations continue to exist that may have arisen prior to closure.

Anthony J. de Ferris
(Signature)

Vice President - Finance
(Title)

Route 662 North, Douglassville, PA 19518
(Address)

Taken, sworn and subscribed before me, this
15th day of September A.D. 1986

David R. Magill

(Notary)

DAVID R. MAGILL, Notary Public
Douglassville, Berks County
My Commission Expires Aug. 29, 1987

PROFESSIONAL ENGINEER CERTIFICATION OF CLOSURE

I, JOHN JOSEPH ORANSKY, a Professional Engineer registered
(Name)

pursuant to the Professional Engineers Registration Law, 63 P.S. §§148 et seq., hereby
certify that I have reviewed the Closure Plan for the STORAGE FACILITY at
(Type of Facility)

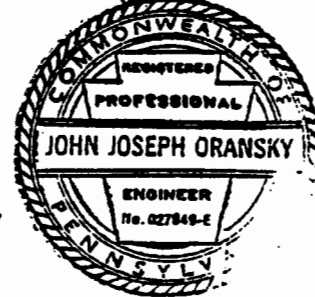
KIWI BRANDS INC.
(Name of Hazardous Waste Facility)

at ROUTE 662 NORTH DOUGLASSVILLE PA. 19518
(Location)

that I am familiar with the rules and regulations of the Pennsylvania Department of
Environmental Resources pertaining to closure of such facility, and that I personally have
made visual inspection(s) of the aforementioned facility, and that the closure of the
aforementioned facility has been performed in full and complete accordance with the
facility's closure plan approved in writing by the Department of Environmental Resources on
September 10, 1986, and the rules and regulations of the Department
codified at 25 Pa. Code Chapter 75.

John Joseph Oransky
(Signature)

SEPT. 10 1986
(Date)

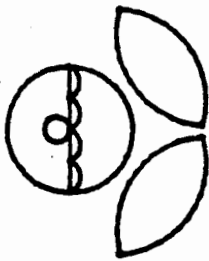


(Seal)

027849-E
(Professional Engineering License Number)

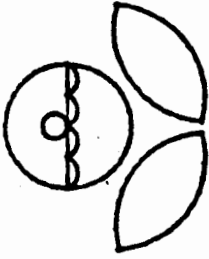
SPATIS, STEVENS & McCOY, INC
375 N WYOMISSING BLVD PO BOX 6307
(Business Address)

215-376-6581
(Telephone Number)



EPA REGION 3

URGENT FAX



EPA REGION 3

Please deliver at once to MIKE MELLINGER

Phone _____ Mailcode KIWI BRANDS

Sent by KEVIN BOYD Phone (215) 566-3418

This page is followed by a 5 page transmission.

Sent at 3:55 (time) 10/6/97 (day)

MIKE,

PAUL GOTTHOLD ASKED ME TO FAX THIS TO YOU. I HAVE BEEN ASSIGNED AS PROJECT MANAGER FOR YOUR FACILITY. IF YOU HAVE ANY QUESTIONS, PLEASE GIVE ME A CALL.

RCRA PRIORITIZATION SYSTEM SCORING SUMMARY

FOR

PAD 097 153 399

EPA SITE NUMBER: KIWI BRANDS

DOUGLASSVILLE, PA

SCORED BY: KLF

OF DYNAMAC

ON 10/30/91

GROUNDWATER SCORE	:	60.60	NO
SURFACE WATER SCORE:		45.09	PP
AIR ROUTE SCORE	:	3.67	NO
ONSITE SCORE	:	100.00	YES

MIGRATION SCORE	:	62.69	YES

EPA ID NO. : KIWI BRANDS
PAD 097 153 399

WS-1 GROUNDWATER ROUTE

IS THERE AN OBSERVED RELEASE? Y

ROUTE CHARACTERISTICS

DEPTH TO AQUIFER (FT.) : NA

NET PRECIPITATION (IN.) : NA

PHYSICAL STATE: NA

CONTAINMENT:

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CHROMIUM

TOXICITY/PERSISTENCE VALUE: 18

QUANTITY KNOWN? YES

CUBIC YARDS OR TONS:	0
DRUMS :	20

TARGETS

GROUNDWATER USE: DRINKING WATER

DISTANCE TO WELL (MILES): 0.5

WS-2 SURFACE WATER ROUTE

RELEASES

IS THERE AN OBSERVED RELEASE? Y

IS THERE A PERMITTED OUTFALL?

HAVE THERE BEEN PERMIT VIOLATIONS?

ROUTE CHARACTERISTICS

FACILITY LOCATION: NA

24-HOUR RAINFALL: NA

DISTANCE TO SURFACE WATER (MILES): NA

PHYSICAL STATE: NA

CONTAINMENT: NA

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CHROMIUM

TOXICITY/PERSISTENCE VALUE: 18

QUANTITY KNOWN? YES

CUBIC YARDS OR TONS:	0
DRUMS :	20

TARGETS

SURFACE WATER USE: POSSIBLE DRINKING WATER OR RECREATION

DISTANCE TO INTAKE OR CONTACT POINT (MILES): 0.8

DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 1.0

EPA ID NO. : KIWI BRANDS
PAD 097 153 399

WS-3 AIR ROUTE

RELEASES

IS THERE AN OBSERVED, UNPERMITTED, ON-GOING RELEASE? N
DOES THE FACILITY HAVE AN AIR OPERATING PERMIT(S)? N
ANY PERMIT VIOLATIONS OR ODOR COMPLAINTS BY RESIDENTS? N
CAN CONTAMINANTS MIGRATE INTO AIR? Y
CONTAINMENT: GOOD

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CHROMIUM

TOXICITY/PERSISTENCE VALUE: 3

QUANTITY KNOWN? YES

CUBIC YARDS OR TONS: 0
DRUMS : 20

TARGETS

POPULATION: RESIDENCES ARE LOCATED WITHIN FOUR MILES
DISTANCE TO SENSITIVE ENVIRONMENT (MILES): 1.0

EPA ID NO. : KIWI BRANDS
PAD 097 153 399

WS-4 ON SITE CONTAMINATION

ACCESS TO SITE: UNLIMITED ACCESS

IS THERE AN OBSERVED SURFACE SOIL CONTAMINATION? Y

CONTAINMENT: POOR

WASTE CHARACTERISTICS

CHEMICAL NAME OR WASTE CODE NUMBER: CHROMIUM

TOXICITY/PERSISTENCE VALUE: 3

TARGETS

DISTANCE TO RESIDENTIAL AREAS (MILES): 0.08

IS THERE AN ON-SITE SENSITIVE ENVIRONMENT: Y

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART A

Date of Inspection 9-18-96 Time start _____ Time finish _____
Name of Inspector Susan M. Werner
Company, installation name Kiwi Brands Inc.
Location 447 Old Swede Road
County Berks Municipality Amity Twp.
Identification number PAD 097 153 399
Name of responsible official Peter A. Burke
Title Vice President of Regional R&D
Mailing Address 447 Old Swede Road Douglasville PA 19518-7239
Area code and telephone number 610 385 3041
Name of person interviewed Mike Mellinger
Title Environmental Affairs Mgr.
Mailing address (if different from above) Same
Area code and telephone number Same

1. Current waste handling method:

- | | | | | |
|---|-------------------------------------|-----------------------------------|--|----------------------------------|
| a. <input type="checkbox"/> On-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input type="checkbox"/> disposal | <input type="checkbox"/> PBR |
| b. <input type="checkbox"/> On-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |
| c. <input checked="" type="checkbox"/> Off-site | <input type="checkbox"/> treatment, | <input type="checkbox"/> storage, | <input checked="" type="checkbox"/> disposal | |
| d. <input type="checkbox"/> Off-site | <input type="checkbox"/> use, | <input type="checkbox"/> reuse, | <input type="checkbox"/> recycle, | <input type="checkbox"/> reclaim |

2. Amount of hazardous waste produced:

- a. 6072.02 kg./mo. 161030 lbs/yr
b. 72864.2 kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
DEC 1, DEC 7, FOC 3, DEC 9, DEC 6, FOC 2, FOC 5	ENSCO Inc.	El Dorado, AR
DEC 1, DEC 2, DEC 1, DEC 4, DEC 3, DEC 8, FOC 2, FOC 3, FOC 5	ENSCO Inc.	Dalton, GA

4. Source Reduction: ☒ accomplished, ☒ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS - PART B

Site Name Kiwi Brands Inc. ID Number PAD 097 153 399 Date 09-25-96

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
1				Hazardous waste determination, performed on all waste streams	262.11	H001
1				Identification number	262.12	H002
1				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
	2			Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
	2			PA manifest used for intrastate shipments	262.20(b)	H005
1				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
1				Manifests filled out properly and completely	262.20(g)	H007
1				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
		3		Proper U.S. DOT shipping containers or packages being used	262.30(1)	HC
		3		Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
1				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
1				Placards offered to transporter	262.33	H012
1				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
1				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
1				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
1				a). All containers of haz. waste in good condition	265.171	H016
1				b). Containers compatible with hazardous waste being stored within	265.172	H017
1				c). Containers of hazardous waste kept closed	265.173(a)	H018
1				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
1				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
1				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
1				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
1				h). Proper containment and collection system(s)	265.178	H023
1				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
1				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

Hazardous Waste Inspection Report

Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
				Records retained at designated location for 20 years	262.40(a)	H026
	2			Quarterly reports submitted to the Department	262.41(a)	H027
1				Exception reporting procedures followed	262.42	H028
	2			Hazardous waste disposal plan, if required	262.45	H029
1				Spill reporting procedures followed	262.46(a)	H030
1				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
	2			Special requirements followed for international shipments	262.50,.53, .55,.60	H032
1				Source reduction strategy prepared and available	262.80	H033

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection: September 18, 1996
Company/Facility/Site Name: Kiwi Brands Inc.

Identification Number: PAD097153399

I arrived on-site and met with Mr. Mike Mellinger. I explained I was there to conduct a hazardous waste generator inspection and we proceeded on the inspection of the plant.

Three drums of hazardous waste were observed in the production line 2 hazardous waste accumulation area. All the drums were labeled and dated.

The facility was preparing to transport the next day. Most of the drums in the 90-day accumulation area were labeled and plastic wrapped on the pallet ready for transport. All the drums inspected in this area were properly labeled. Kiwi does not have special containment for the hazardous wastes but uses the building as containment. Several cracks were noted on the floor near the drums. These need to be repaired.

Four drums of aerosol hazardous waste were observed in the aerosol storage area. These drums are kept with the aerosol products in a special storage area designed to contain any cans that may explode.

The solvent storage area contained one drum of hazardous waste ready for shipment and one drum that was not
f Both drums were labeled and dated.

The mineral spirit unloading area has been re-paved since the spill last year. The area is now contained and drains to a concrete holding pond. The new design should prevent mineral spirit spills from reaching the environment in the future.

After completing the inspection of the facility, we returned to the office to review the records.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (Signature) Faxed + Mailed Date 10-10-96

Inspector (Signature) James M. Newz Date 10-10-96

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection: September 18, 1996
Company/Facility/Site Name: Kiwi Brands Inc.

Identification Number: PAD097153399

Quarterly Reports

Quarterly reports were reviewed for the period of first quarter 1995 through fourth quarter 1995. The fourth quarter 1995 report will be the last quarterly report filed by the company because they have been notified by the Department that they are no longer required to file quarterly reports.

Inspection Logs

The hazardous waste storage area inspection logs were reviewed for the period of January 1996 to present. They inspections are being conducted weekly and no problems were observed with the log. Residual waste is also stored in the 90-day accumulation area and are included in the inspection.

Manifests

Manifests were reviewed for 1996 to present. No problems were observed.

RECOMMENDATIONS:

1. Repair the cracks in the flooring in the 90-day hazardous waste accumulation area.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature) Faxed & Mailed Date 10-10-96

Inspector (Signature) Juan M. 2/22/96 Date 10-10-96

**Appendix B -
Part B
Additional Documentation Obtained During Site Inspection**

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Appendix B

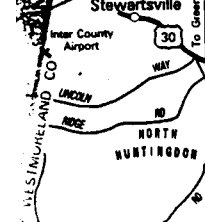
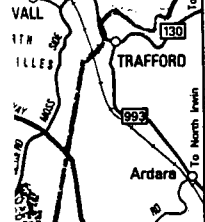
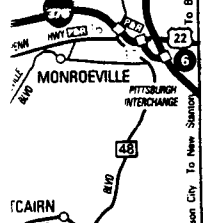
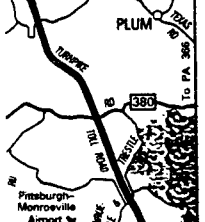
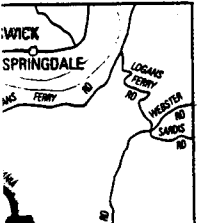
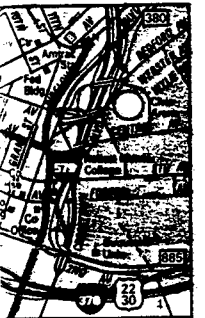
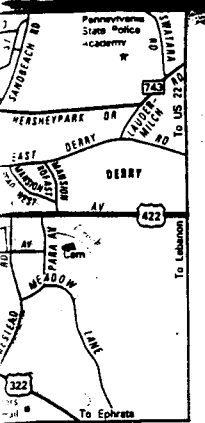
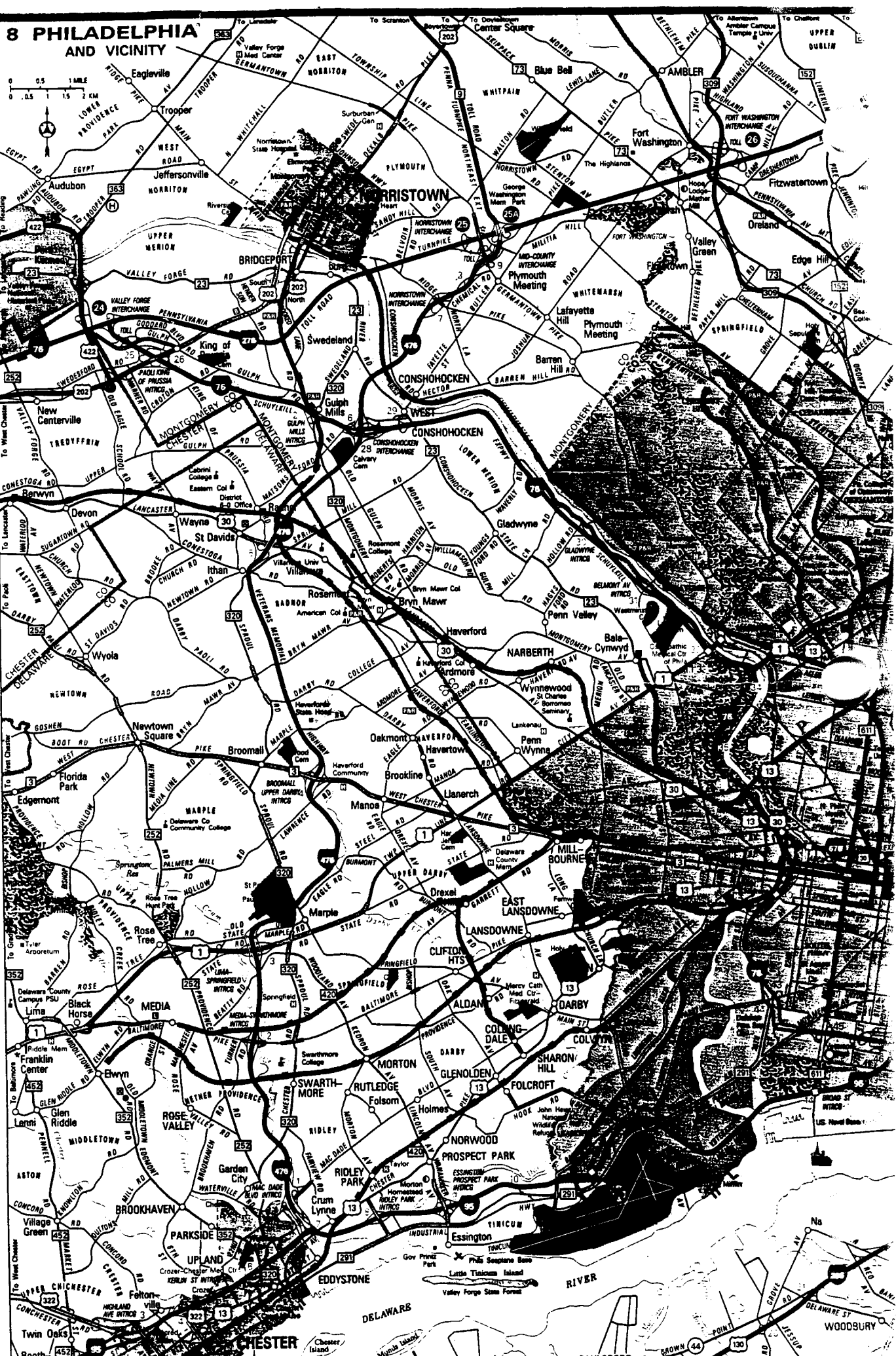
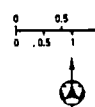
Part B

Additional Documentation Obtained During Site Inspection

- Facility map – no source and date.
- Correspondences between The Kiwi Polish Company and USEPA dated November 13, 1980:
Subject: USEPA notifications letter that Kiwi must apply for a permit as a treatment, storage, or disposal facility under the RCRA Hazardous Waste Program.
- Correspondences between The Kiwi Polish Company and USEPA dated November 19, 1980:
Subject: Permit application for the RCRA Hazardous Waste Program.
- Correspondence between Kiwi Brands, Inc. and USEPA dated December 29, 1980:
Subject: Acknowledgment of Application for a Hazardous Waste Permit.
- Correspondence between Kiwi Brands, Inc. and USEPA dated July 23, 1981:
Subject: Letter indicating that the Agency has processed Kiwi's Part A Hazardous Waste Permit Application.
- Correspondence between Kiwi Brands, Inc. and USEPA dated October 2, 1981:
Subject: Letter indicating that an error had occurred in the Part A Permit Application.
- Correspondence between Kiwi Brands, Inc. and USEPA dated October 14, 1981:
Subject: Acknowledgement letter from USEPA of receipt of Kiwi's request to change to "Conditions of Operations During Interim Status".
- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated April 9, 1986:
Subject: Letter requesting delisting of a concrete evaporative tank from being a hazardous operation. Letter contains backup analytical data.
- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated May 7, 1986:
Subject: Correction to the Hazardous Waste Activity form submitted on April 8, 1986.
- Correspondence between Kiwi Brands, Inc. and USEPA dated June 4, 1986:
Subject: Documentation of a telephone conversation.

- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated July 30, 1986:
Subject: Documentation for the administrative closure of the evaporative concrete tanks.
- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated June 20, 1986:
Subject: Construction of a third concrete evaporating tank.
- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated August 21, 1986:
Subject: Analytical results for rainwater that has collected in the overflow concrete tank.
- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated September 10, 1986:
Subject: Approval letter for the closure of a collection tank, two evaporator tanks, and an overflow tank.
- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated September 18, 1986:
Subject: Closure certification forms for a collection tank, two evaporator tanks, and the overflow tank.
- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Resources dated August 4, 1986:
Subject: Acknowledge receipt of a closure plan.
- Hazardous Waste Inspection Report Generators – Part A, dated June 12, 1997.
- Correspondence between Kiwi Brands, Inc. and Pennsylvania Department of Environmental Protection dated January 30, 1998:
Subject: 1997 Hazardous Waste Report.

8 PHILADELPHIA AND VICINITY





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

November 13, 1980

Dear Sir:

EPA has received your notification form which indicates that your facility may be engaged in the treatment, storage, or disposal of hazardous waste. The Resource Conservation and Recovery Act requires that owners and operators of such facilities must obtain a permit from EPA or an authorized State. In order for you to continue your current treatment, storage or disposal operations after November 19, 1980, your facility must qualify for "interim status". Facility owners and operators who qualify for "interim status" are treated as having a permit until EPA or an authorized State makes a final determination on the permit application.

Timely submission of both a notification, under Section 3010 of the Act, and a Part A application qualifies owners and operators of existing (in operation or under construction by November 19, 1980) hazardous waste management facilities for interim status. Facility owners or operators with interim status must also comply with interim status standards set forth in 40 CFR Part 265 (May 19, 1980) or with the equivalent provisions of authorized State programs.

Failure to submit a complete Part A by November 19, 1980 will jeopardize interim status and may result in enforcement action if the facility continues to handle hazardous waste. Forms 1 and 3 must be submitted together and Form 3 must be signed by the owner and operator. You need to submit only one Permit Application per site or location, provided that you describe all of the activities at that site or location. If you conduct hazardous waste activities at more than one site or location, you must submit a separate application for each site or location. Facilities may only handle the hazardous waste or use the processes listed in Part A.

If you have any question or need any assistance in completing the Part A application, please call Shirley Bulkin at 215-597-3751 or 1230.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Thomas Voltaggio".

Thomas Voltaggio
Acting Director, Enforcement Division

THE KIWI POLISH COMPANY^{PTY LTD}

U.S.A. DIVISION

ROUTE 662, NORTH DOUGLASSVILLE, PA 19518



Phone: (215) 385-3041 Cables: Kiwi Douglassville Telex: 846384

19th November 1980

Mr. Thomas Voltaggio
Acting Director, Enforcement Division
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III
6th and Walnut Streets
Philadelphia, Pennsylvania 19106

REFERENCE: Pottstown EPA I.D. Number PADO02353910
Douglassville EPA I.D. Number PADO97153399 -

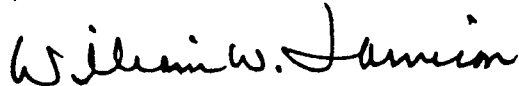
Dear Mr. Voltaggio:

As per your EPA recommendations, we have filed for a permit under the RCRA Hazardous Waste Program as a treater and storer at our Douglassville facility as indicated on the application that has been filed. It is undetermined whether hazardous waste will be treated or stored due to the fact that the surface impoundment is just initiating activity.

However, our Pottstown manufacturing capabilities, which were originally listed in the notification, are in the process of being moved to our new facility in Douglassville. For an interim period of time, this operation will still generate hazardous waste and, therefore, the notification is valid under that criteria but this facility is not a disposer, treater or transporter of hazardous waste.

Yours faithfully,

THE KIWI POLISH COMPANY PTY. LTD.
(U.S.A. Division)

A handwritten signature in cursive script that reads "William W. Jamison".

WILLIAM W. JAMISON
Vice President - Manufacturing

WWJ/rme

FORM 1 GENERAL INFORMATION		U.S. ENVIRONMENTAL PROTECTION AGENCY Consolidated Permits Program (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER	
EPA I.D. NUMBER		F P A D 0 9 7 1 5 3 3 9 9		GENERAL INSTRUCTIONS	
III. FACILITY NAME		PLEASE PLACE LABEL IN THIS SPACE		If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
V. MAILING ADDRESS					
VI. FACILITY LOCATION					

SPECIFIC QUESTIONS		MARK 'X'		SPECIFIC QUESTIONS		MARK 'X'	
YES	NO	FORM ATTACHED	YES	NO	FORM ATTACHED		
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X		
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X	D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X		
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)		X	yes	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X		
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		

III. NAME OF FACILITY	
1	THE KIWI POLISH CO PTY LTD USA DIVISION

IV. FACILITY CONTACT			
A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)	
2	BURKE PETER A LABORATORY MGR	215	385 3041

V. FACILITY MAILING ADDRESS							
A. STREET OR P.O. BOX		B. CITY OR TOWN		C. STATE		D. ZIP CODE	
3		ROUTE 662 NORTH		PA		19518	
4		DOUGLASSVILLE					

VI. FACILITY LOCATION											
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME		C. CITY OR TOWN		D. STATE		E. ZIP CODE		F. COUNTY CODE (if known)	
5		ROUTE 662 NORTH		BERKS		PA		19518			
6		DOUGLASSVILLE									

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST				B. SECOND			
7	28	4	2	(specify) Shoe and leather care products. Floor polish.	7	28	4
				(specify) Liquid soaps.			
C. THIRD				D. FOURTH			
7				(specify)	7		
				(specify)			

VIII. OPERATOR INFORMATION

A. NAME												B. Is the name listed in Item VIII-A also the owner?																		
8	T	H	E	K	I	P	O	L	I	S	H	C	O	P	T	Y	L	T	D	U	S	A	D	I	V	I	S	I	O	N
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																		D. PHONE (area code & no.)												
F = FEDERAL M = PUBLIC (other than federal or state) S = STATE O = OTHER (specify) P (specify)																		2 1 5 3 8 5 3 0 4 1												
E. STREET OR P.O. BOX																														
ROUTE 662 NORTH																														
F. CITY OR TOWN																		G. STATE		H. ZIP CODE		IX. INDIAN LAND								
B DOUGLASSVILLE																		PA		1 9 5 1 8		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO								

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
9	N									9	P								
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
9	U									9									
										(specify)									
C. RCRA (Hazardous Wastes)										F. OTHER (specify)									
9	R									9									
										(specify)									

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Manufacturer and distributor of consumer products with a predominant portion of business in the shoe care related product category.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)		B. SIGNATURE		C. DATE SIGNED	
W. W. Jamison Vice President Manufacturing		W. W. Jamison		19 Nov 1980	

COMMENTS FOR OFFICIAL USE ONLY

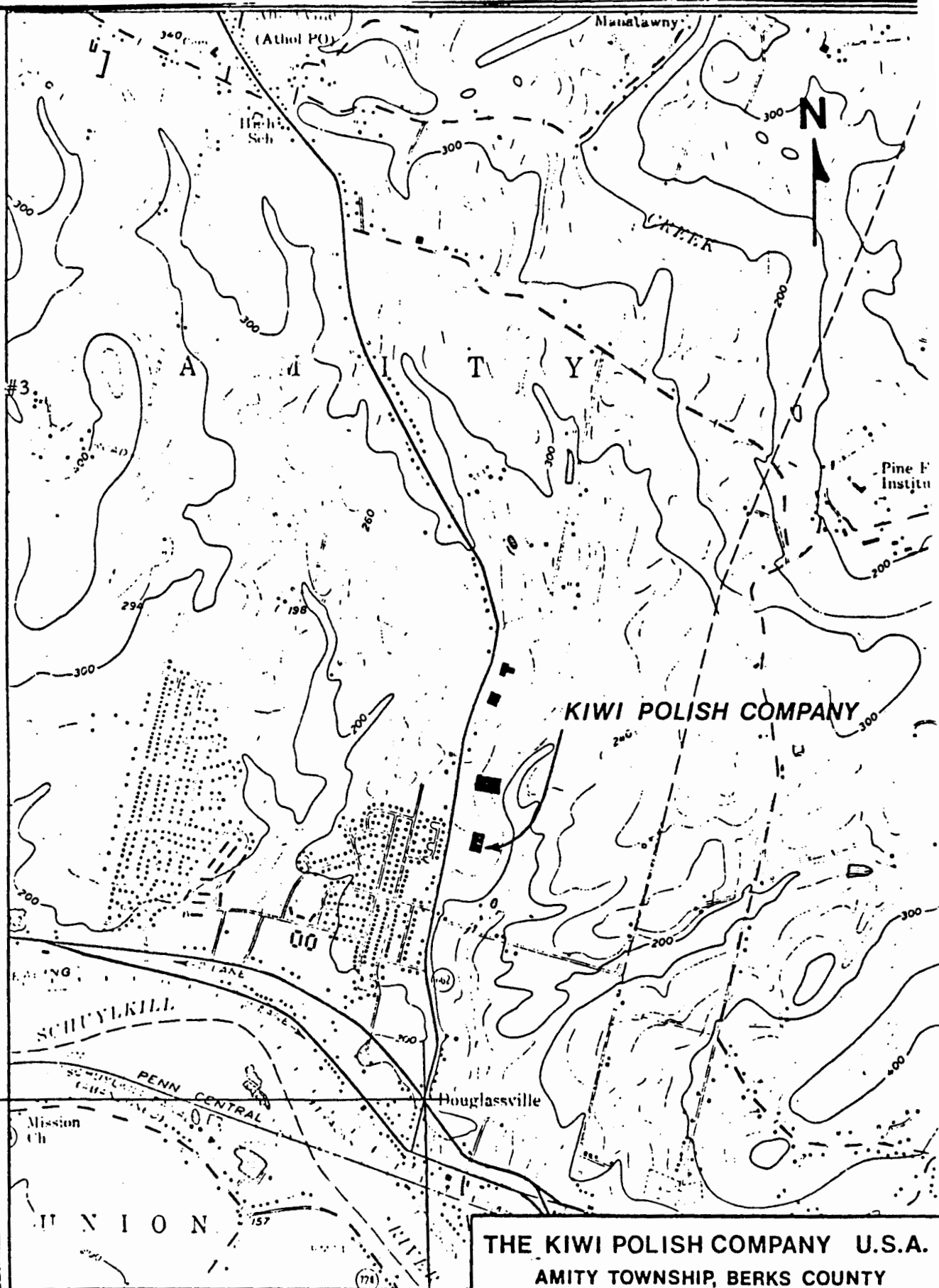
C	
15	16

FROM U.S. GEODESIC MAP

1. No drinking wells within 1/4 mile.

2. Fire pond is sited on plot locations page 5 of form #3.

Latitude
40°15' 28"



BOYERTOWN QUADRANGLE 1973

THE KIWI POLISH COMPANY U.S.A.
AMITY TOWNSHIP, BERKS COUNTY

LOCATION PLAN

CONTINUE ON REVERSE

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE, INCLUDE DESIGN CAPACITY.

N/A

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE **CODE**
 POUNDS. P
 TONS. T

METRIC UNIT OF MEASURE **CODE**
 KILOGRAMS. K
 METRIC TONS. M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. **PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

W Z O J Z	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEA- SURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

N/A

EPA I.D. NO. (enter from page 1)

5	F	P	A	D	0	9	7	1	5	3	3	9	9	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

Existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

40°	15'	28"
65	66	67

LONGITUDE (degrees, minutes, & seconds)

75°	43'	35"
72	73	74

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
E	G		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

W. W. Jamison
Vice President Manufacturing

B. SIGNATURE

W. W. Jamison

C. DATE SIGNED

19 November 1980

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

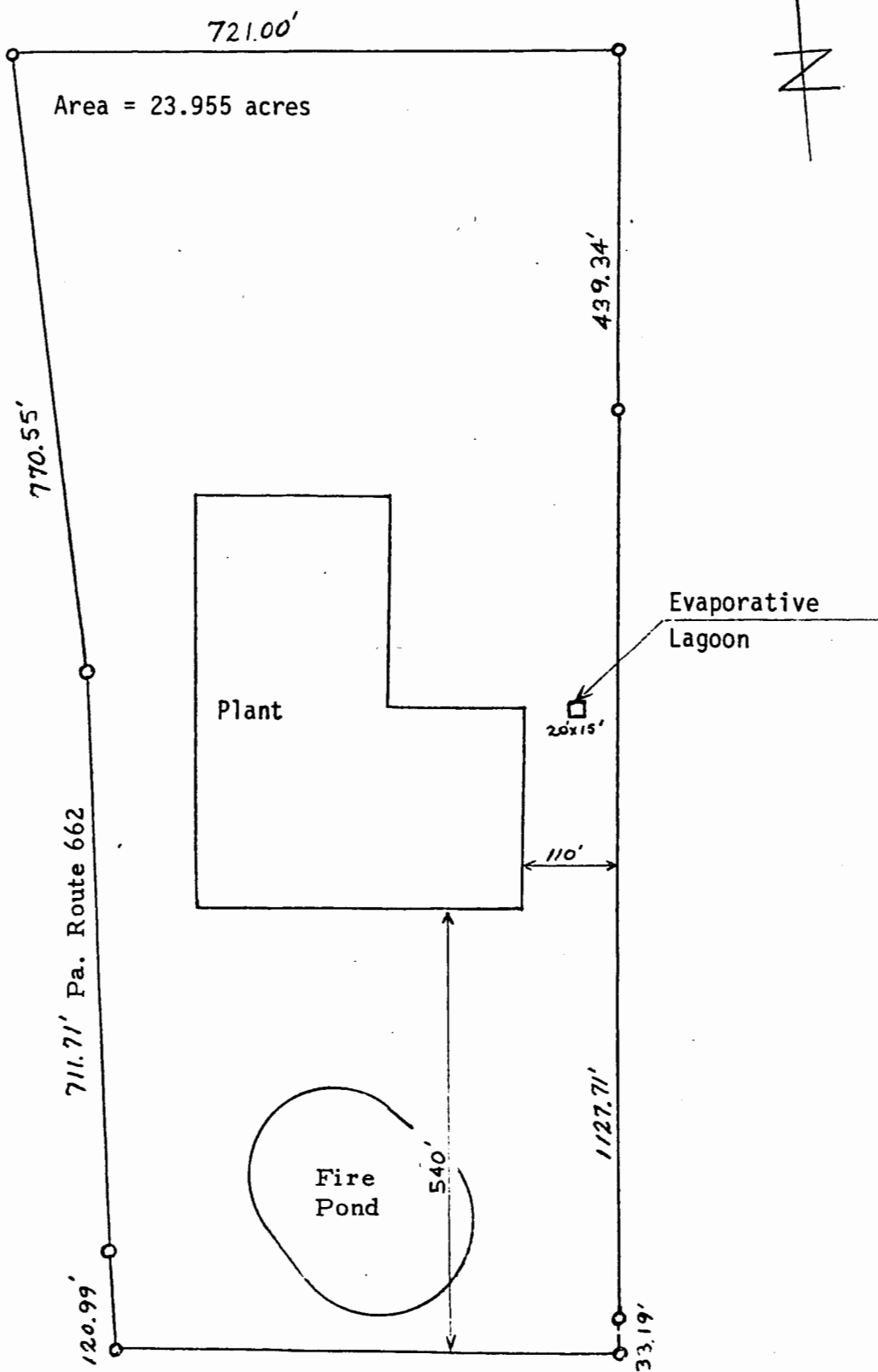
C. DATE SIGNED

EPA I.D. NUMBER (enter from page 1)															FOR OFFICIAL USE ONLY									
<div style="display: flex; justify-content: space-between;"> W P A D 0 9 7 1 5 3 3 9 9 T A C </div>															<div style="display: flex; justify-content: space-between;"> W DUP T A C 2 DUP </div>									

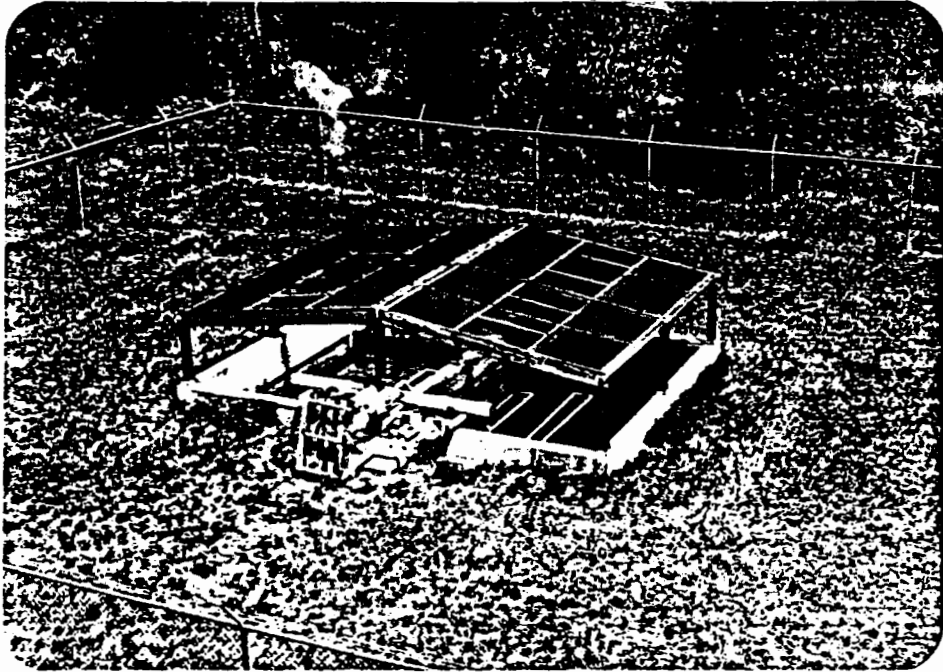
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES							
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))			
				27 - 29	27 - 29	27 - 29	27 - 29	27 - 29	27 - 29	27 - 29	27 - 29
1	D 0 0 9	8800*	P	S	0	4	T	0	2		
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3											
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26											

A. FACILITY DRAWING (see page 4)



Scale: 1" = 200'-0



Photograph of Surface Impoundment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

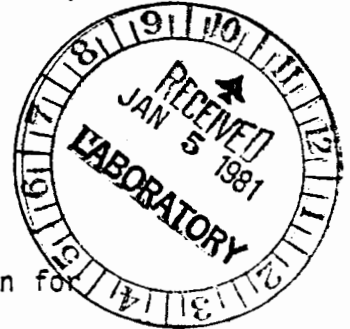
EPA I.D. # PAD 097153399

December 29, 1980

The Kiwi Polish Co.
Route 662 North
Douglassville, Pa. 19518

Attn: Peter A. Burke

Re: Acknowledgment of Application for
a Hazardous Waste Permit



This is to acknowledge that the Environmental Protection Agency has received: (1) A notification pursuant to Section 3010 of the Resource Conservation and Recovery Act for the facility located at the address shown above; and (2) Part A of a Hazardous Waste Permit Application for that facility, including a signed statement that the operation of the facility, or its construction, began prior to November 19, 1980. While the information provided by these submissions has not been fully reviewed for completeness or accuracy, EPA will accept this information as an initial qualification for interim status pursuant to Section 3005 of the Act. If after further review of this information, EPA determines that the owner or operator did not fulfill all the requirements for interim status, EPA may treat the owner or operator as not having qualified for interim status pursuant to that section and will advise the owner or operator of that determination. Facility owners and operators with interim status must comply with the standards set forth at 40 CFR Part 265 until a permit is issued. Interim status may be terminated if the owner or operator fails to furnish any additional information requested by EPA in order to process a permit application.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

JUL 23 1981

Mr. W. W. Jamison
Kiwi Polish Company - USA Division
Route 662 North
Douglasville, PA 19518

Dear Mr. Jamison:

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA. ?

A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application. ?

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities, and types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23. ?

If you have any questions concerning this letter, please write to the address shown or call Bill Walsh at 215/597-1230.

Sincerely yours,

Shirley D. Bulkin

Shirley D. Bulkin
Chief, Administrative Support Section
Permit Enforcement Branch

Enclosure

CONDITIONS OF OPERATION DURING
INTERIM STATUS

Date Prepared: July 23, 1981

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

1. Facility name, location, and EPA Identification Number.

Name: Kiwi Polish Company - USA Division

Location: Route 662 North
Douglasville, PA 19518

EPA I.D. No.: PAD 09 715 3399

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265.

Owner's Name: Mr. W. W. Jamison - Vice President of Manufacturing

Operator's Name:

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated.

<u>PROCESS</u>	<u>DESIGN CAPACITY</u>
<u>S04</u>	<u>9000 Gals.</u> ?
<u>T04</u>	<u>800 Gals/Day</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid waste exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers.

D009

<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

THE KIWI POLISH COMPANY PTY. LTD.

U.S.A. - 11



ROUTE 662 NORTH, DOUGLASSVILLE, PENNSYLVANIA 19518

PHONE (215) 385-3041 CABLES KIWI DOUGLASSVILLE TELEX 846384

2 October 1981

Mr. Thomas Voltaggio
Acting Director, Enforcement Division
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III
6th and Walnut Streets
Philadelphia, Pennsylvania 19106

REFERENCE: Douglassville EPA I.D. Number PAD097153399

Dear Mr. Voltaggio:

During our initial filing as a treater and storer of hazardous waste in a surface impoundment, an error occurred by calling it a surface impoundment since closer inspection of the definition now of surface impoundment does not apply to our operation. Our particular treatment facility actually is a tank since the construction is impervious to leaching. The tank, as we would now like it to be reclassified, is constructed of seven inches reinforced concrete and, therefore, is obviously impervious to leaching and, furthermore, fulfills requirements of structural integrity.

Attached for your review is an engineering sketch of the tank.

Should you require further information concerning this topic, please contact the writer.

Yours truly,

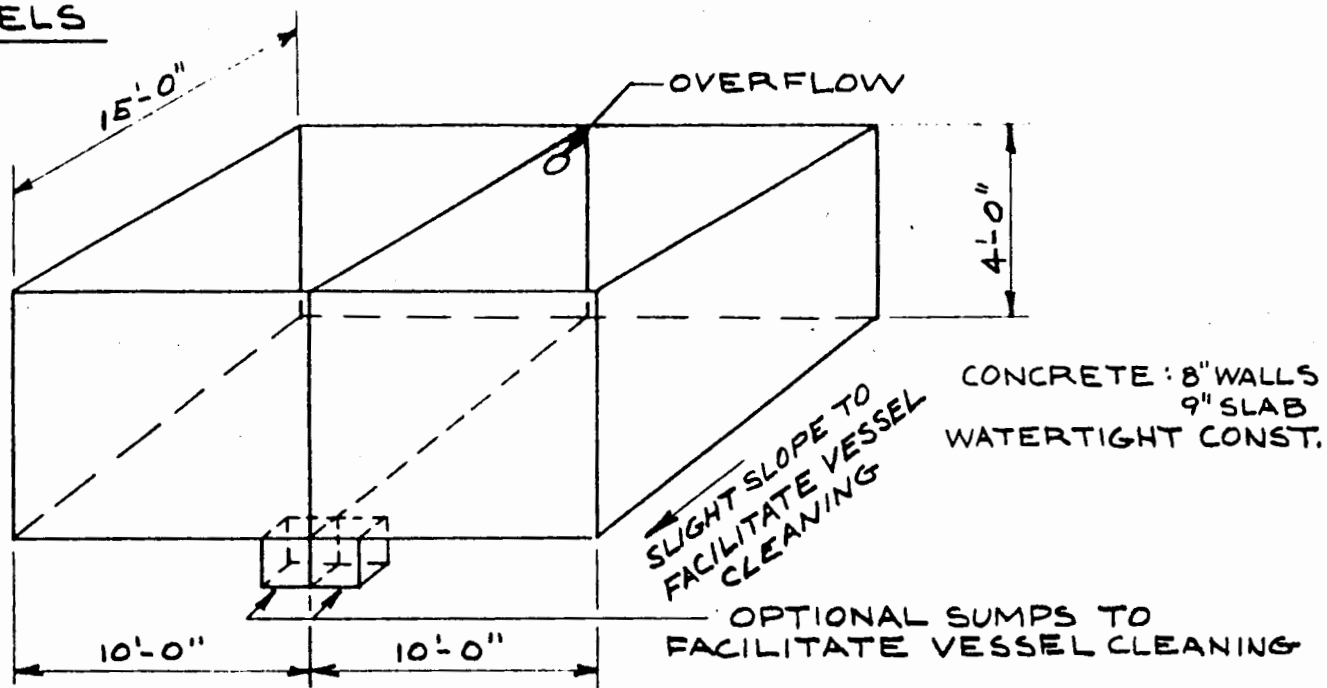
Peter A. Burke
Laboratory Manager

js

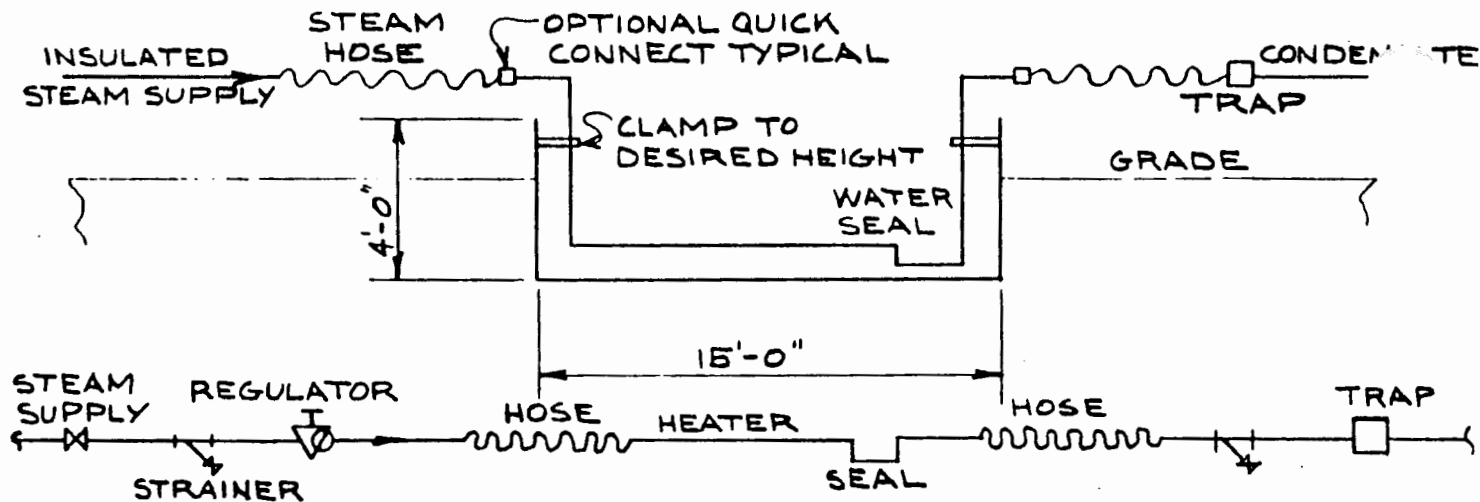
Attach:

ATTACHMENT 7
CONCEPTUAL SKETCHES
COMBINATION TREATMENT SHOWN
NOT TO SCALE

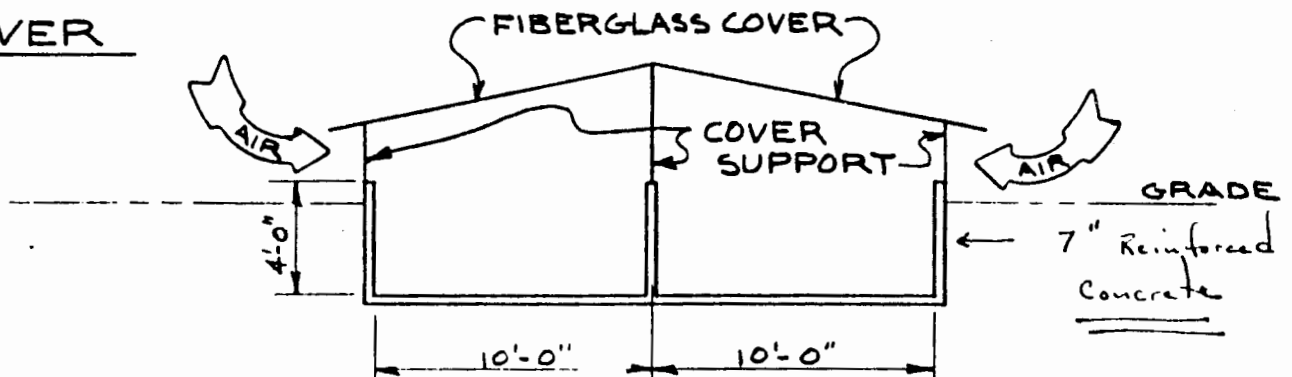
VESSELS



PIPING (STEAM ONLY SHOWN: WASTE MUST ALSO BE PIPED TO VESSELS)



COVER



VESSELS ARE SHOWN BELOW GRADE TO TAKE ADVANTAGE OF SOIL INSULATION, HOWEVER, BY RAISING THE COVER ELEVATION, THE VESSEL CAN BE LOCATED ABOVE GRADE, BUT VESSEL INSULATION IS THEN PREFERRED IF STEEL TANKS ARE SELECTED. THE METHOD OF VESSEL CLEANING MUST ALSO BE CONSIDERED IN THE DETERMINATION OF ABOVE



ENGINEERING REPORT
INDUSTRIAL WASTEWATER TREATMENT

THE KIWI POLISH COMPANY (USA)
AMITY TOWNSHIP
BERKS COUNTY
PENNSYLVANIA

MAY, 1979

Spotts, Stevens and McCoy, Inc.

CONSULTING ENGINEERS
WYOMISSING, PENNSYLVANIA

ENGINEERING REPORT
INDUSTRIAL WASTEWATER TREATMENT

THE KIWI POLISH COMPANY (USA)
AMITY TOWNSHIP
BERKS COUNTY
PENNSYLVANIA

MAY, 1979

Spotts, Stevens and McCoy, inc.



Order No.
4129-001

CONSULTING ENGINEERS

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ENGINEERING REPORT
INDUSTRIAL WASTEWATER TREATMENT
THE KIWI POLISH COMPANY (USA)
AMITY TOWNSHIP
BERKS COUNTY
PENNSYLVANIA

INTRODUCTION

This report is submitted as a final engineering report subsequent and referenced to the "Preliminary Engineering Report" of October, 1978 (PER).

SUMMARY

Representative samples of industrial wastes and flow information were received from the Kiwi Polish Company (USA), Pottstown, Plant (hereafter Kiwi), and solar evaporation tests were run. Based upon the results of these tests, final design criteria for waste treatment facilities were obtainable pending selection of the favored process technique by Kiwi. Certain treatment techniques as presented in the PER have been disqualified because of high capital, operating, or maintenance costs or because of lack of design flexibility which may be required to allow for future unknown production changes which would subsequently be reflected in changes of chemical composition or flow rates of the waste water.

The final three (3) processes under consideration are:

- (1) solar evaporation only



- (2) steam evaporation only
- (3) a combination of solar and steam evaporation

Choice number (3) is the preferred selection in the opinion of the report writers. Final design should be based upon 800 gallons per day (GPD), average wastewater flow. The treatment system will accommodate moderately significant fluctuations in the average flow rate, easily ranging from the reported 0 to 1100 GPD.

PROCEDURES AND DISCUSSION

Six (6) test samples were prepared from the supplied samples as shown in Attachment 1. Each test sample was placed in a test pan of one (1) square foot of surface area and placed in an outdoor environment. After allowing a brief time for the water temperature to reach near equilibrium with ambient temperatures, liquid depths were measured in each pan and recorded along with time, ambient temperature, relative humidity, and estimated wind velocity. There were no periods of rain. At periodic intervals, the same types of data were again collected and recorded as in Attachment 2. The evaporation rates were then calculated for each sample as shown in Attachment 2.

Known evaporation rates for water evaporation, as shown in Attachment 3, were plotted as shown in Attachment 4. Overall evaporation rates



appear to compare favorably with those of water, which is reasonable in that the solids content is only a fraction of one percent (1%). The sample liquid evaporation rate was then plotted in Attachment 4, allowing a 25% factor of safety from the curve of water in air at a velocity of 300' per minute (approximately 3.4 mph).

Samples 4 and 5 appeared to be leaking from the test tray, subjecting the results to question, but because these results were not utilized in the plotting and were not necessarily critical as compared to Samples 1 and 6, it is believed that Samples 4 and 5 can be discarded except for general observations and comparisons.

A test piece of steel and copper tubing was placed into each test pan to observe any coating potential which could represent a problem of scale buildup on the tank walls or bottom or other surfaces within the treatment tank. Only those samples containing "scuffs" appear to be a potential problem. However, it is believed, in view of the facts that "scuff" represents only a small fraction of the total flow and that steam pipes, if employed, may be hot enough to "burn" scuff from pipe surfaces, this problem will be a very gradual problem at the worst condition. It may be necessary to periodically clean "scuff" films from vessel or piping surfaces, or, if preferable, simply replace certain sections of pipe periodically. Pipe surfaces can be scraped and cleaned rather easily.



Air samples will be drawn from an evaporating (high liquid temperature) sample to determine whether a potential air pollution problem exists. Fresh liquid samples will be used for these evaluations. Because of the urgency of this report, an addendum to this report will be made at a later time to discuss potential air problems, if any, since laboratory work involving these problems has not yet been completed.

There was a definite odor problem with the supplied samples. However, it was noted that the supplied samples were several months old, in certain cases, at least. It is probable that such odor is the result of biological attack or decay and may not result if the water wastes are treated on a current and undelayed basis at the treatment conditions. It is believed that, if odor would prove to be a problem, solution of the problem should be relatively simple and economical and further discussion of odor problems is postponed along with the air pollution addendum especially in view of the uncertainty of the existence of the odor problem, if any.

CONCEPTUAL DESIGN

Any production changes will subsequently result in changes in concentrations, chemical compositions, and flow rates of the waste waters. Such changes in waste water characteristics will significantly affect the operation of treatments employing incineration or chemical treatment. Such treatments are relatively complex in operation, costly to build,



maintain, and operate, and would require permits from regulatory agencies to operate. These permits would require time and rather substantial effort to obtain, and approval is not guaranteed.

It follows, then, that evaporation of the wastes is the preferred treatment, especially because of the relatively small quantities of waste water to be treated. On the average, quantities of waste water are 800 GPD. The system must be tolerant of rather wide flow fluctuations. Solids content of the waste water is less than originally reported, which further favors evaporation techniques. Evaporation techniques provide the greatest process flexibility and permit requirements, insofar as presently expected, are minimal, being limited to permits to haul sludges and solid wastes on an intermittent basis to a certified landfill operation.

Evaporation processes under consideration are:

- (1) solar evaporation only
- (2) steam evaporation only
- (3) a combination of solar and steam evaporation

Solar evaporation only is not recommended by the writers of this report because of the limited cold weather operation. A large amount of storage capacity would be required to enable operation for warm weather.



It must be recognized that large covered surface areas are required to provide enough evaporation area even for relatively small flow rates. The potential threat of odor problems is enhanced if treatment is not accomplished on a current basis.

Steam evaporation by itself is a very viable solution. However, very little effort is required to provide at least some solar evaporation in addition to the steam heat source. Because solar heat can be so easily added and will, of course, minimize steam, and thus, energy requirements, a combination of solar and steam evaporation is recommended. It is reported that steam is available on a year-round basis for treatment purposes.

Although steam heat is suggested as heat source, excluding solar heat, electric heaters could be used as an alternate to steam heat throughout this report. Attachment 5 shows steam costs and electric heater costs for comparative purposes, it is emphasized, however, that the primary reason for disqualifying electric heating sources lies with the marked increase in fire potential. If electric heaters lose contact with the liquid, which is conducting heat away from the heaters but is constantly evaporating, the heaters will rise in temperature to a point of potential damage to the heaters and, more importantly, potential fire threats. Of course, electric heating is also more expensive but does have the benefit of being more convenient and is available in case steam is not.



In order to implement a combination of solar and steam evaporation, two (2) covered pits or evaporation basins are recommended. One of these basins could be "shut down" for cleaning purposes while utilizing the other basin. The basins must be covered and curbed to exclude storm waters. The basins, if covered with a material which will permit transfer of medium or shorter "heat rays" while retaining longer "heat rays", typical of cooler heat sources such as the wastewater, will provide a "greenhouse" effect which would minimize steam consumption. It is evident that evaporation vessels must be located where sunlight is abundant. However, it must be remembered that wind velocity also affects the rate of evaporation and enough air must be provided to remove moisture from the area. Because of these ventilation requirements, it is recommended that the evaporation units be located outdoors so that natural ventilation, rather than power fans and the inherent power requirements, can be utilized. Outdoor location also avoids potential high humidity conditions inside the building which could result in building deterioration. Also, hooding would be required above the evaporation vessels if located indoors in order to prevent such building damage and to prevent "indoor rain" under certain conditions. The outdoor location is favored by the report writers for the above reasons in addition to potential odor problem and the possibility of a permit requirement for air discharges from a point source into the atmosphere. Of course, the indoor location does not permit any solar heat to augment or reduce steam heating requirements.



Recently received samples indicate that solids contents are lower than originally anticipated. Also, steel and copper sample pieces placed into the evaporation test trays have indicated that coating buildup levels are not very great. Therefore, unless actual operating experience would later dictate otherwise, it is initially recommended that steam piping be run inside the evaporation vessel in direct contact with the wastewater. Such positioning allows greater efficiencies for heat transfer when compared to providing steam heat on the vessel exterior. Depending upon final evaporation vessel size, it may be possible to use one steam pipe for both vessels. Removal of the steam pipe from the vessel may also facilitate cleaning of solids from the vessel.

The size of each evaporation vessel and piping sizes are dependent upon the desired water temperature, the amount of surplus storage capacity desired, ease of covering, ease of cleaning, and other factors. Various required sizes, based upon calculations from the test trays, are given in Attachment 5, Table 1. Recirculation of wastewater, of course, would reduce the quantities of water to be evaporated and would, therefore, require less evaporative areas. However, water quality is reportedly not sufficient for such purposes without additional treatment and additional treatment is not economically sound for the small quantities of water recoverable.



Assuming a wastewater temperature of 60°F initially, steam consumption requirements are given in Attachment 5. Steam costs are also given in this Attachment 5. It should be noted that steam flows can be reduced by utilizing higher pressure steam, say 20 psig, if so desired. Examination of the information in Attachment 5 would suggest that the water temperature be raised rather high (say 180°F or above) to evaporate the water rapidly, in light of the minimal cost differential, in one of the evaporation basins. As the other basin fills solar heat can be absorbed, at least during warm weather, in preparation for subsequent steam evaporation. Of course, during cool weather, it may be necessary to immediately heat with steam since little, if any, benefit would be available via solar heating during such times. It should be noted that steam heating allows operation during cool weather. Steam heating can best be optimized after extended periods of operation.

In order to permit ease of installation of the steam pipe above the solids, it is suggested that the pipe be inserted from the top to a position about 2" or so above the apparent bottom of the basin, or the top of the sludge, as applicable. Periodic cleaning of the tank basin or piping will be required. The solids should be rather easily removed manually by removing one of the two basins from service and utilizing the other basin for treatment. Because the basins are



relatively shallow (not to exceed 4'), the tank or basin cleaning should be facilitated. It is recommended that the evaporation vessels be constructed at depths of between 3' and 4'.

Because the basins are heated, unauthorized personnel must be restrained from the basin areas by appropriate fencing. This is an additional reason to minimize the size of the evaporation vessels. However, it is deemed appropriate to provide storage of about five (5) days of typical operation, extended to about one (1) full week (5-day operation), in the event of some unanticipated problem such as loss of the boiler, etc.

At 180°F or more, it is seen that at least 105 square feet surface area are required. However, in order to provide storage for five (5) days, assuming no evaporation, such surface area is not sufficient at a depth of 4'. Adjusting for the limiting values of five (5) days of storage would require two (2) basins each of at least 134 square feet of surface area. If the width of each basin is limited to 10' to accommodate covering, then a divided pit or basin 20' x 15' x 4' deep should provide more adequate surface area and capacity. This area would be divided into two (2) pits side-by-side each 10' x 15' x 4' deep. It is seen that additional capacity can be realized, providing increased system flexibility, simply by increasing the controlled water temperature.



Rectangular shaped vessels are discussed because of greater ease of supporting vessel covers, potential greater flexibility for future vessel modifications, probable greater ease of manually cleaning sludge from the vessel, and the belief that ambient air will achieve greater water surface to air contact with a narrower vessel. However, circular tanks may be desirable from other points of view, depending upon spacing requirements. Vessels of steel or concrete can be considered.

Final design will incorporate sizes and piping layouts for the steam heating system as well as the method of supporting and selection of cover materials. If acceptable, the steam heating pipe could be manipulated from basin to basin, as appropriate, to minimize the number of traps, strainers, and other piping appurtenances. There would be condensate return from the steam heater and this condensate could be returned to the boiler, if feasible.

Rough estimated construction costs, depending upon the final system selected, are given in Attachment 6. Piping of condensate return is not included. Engineering costs, included in Attachment 6, will be virtually the same regardless of the system selected and are estimated to be \$6,000, including the costs for preparing specifications.



Attachment 7 offers conceptual sketches for installation of the treatment system. The combination system is shown but can be converted to solar evaporation only by lengthening the vessels to approximately 308' and removing the steam piping.

It is estimated that solids accumulations will be in the order of 44 pounds per day. At these rates, it is anticipated that vessel cleanings need be performed, perhaps, annually. Such solids will have to be manually removed from the evaporation vessels. Various techniques could be utilized to clean the vessels such as cleaning from the outside of the vessel using a backhoe, cleaning from inside using a front end loader, or by manual shoveling. While the steam pipes, or other heat transfer surfaces, should be kept rather clean, it is not necessary to keep the vessel surfaces ultra-clean, but, rather to remove gross solids accumulations from the evaporation vessels only. Steam pipes, or other heat transfer surfaces, should be examined for films or coatings weekly, at least initially, and kept clean as required. While it would require much longer vessels to permit front end loaders to drive into the vessel, it is feasible to lift a small front end loader into the vessel for cleaning purposes on an infrequent basis, but it is recognized that partial cleaning of the vessel must be accomplished to make room for loader entrance. In order to drive a vehicle into the vessel, slopes should be limited to 5% maximum.



Lengthening the vessels well beyond that required for treatment for the primary purpose of cleaning is possible but not recommended by the writers because of the added costs of construction and the infrequent cleaning requirement expected.



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APPENDIX



Spotts, Stevens and McCoy, Inc.

ATTACHMENT 1

SAMPLE COMPOSITION AND IDENTIFICATION

<u>SAMPLE NO.</u>	<u>IDENTIFICATION</u>	<u>APPROX. % VOL.</u>	<u>SOURCE</u>	<u>APPROX. SUB % VOL.</u>	<u>CONSTITUENTS</u>
1	Total composite	44.19	line #6 washwater		
		17.44	processing sink		
		23.26	line #6 bottle washer		
		5.81	manufacturing tank		
			liquid room	7.98	sneaker saver
				63.38	white cleaner
				2.42	base oil
				0.07	desaler
				26.15	emulsion neutral
		3.49	#3 filler	11.39	deluxe white creme
				88.61	shoe creme
		3.49	cavalier platform	10.79	saddle soap
				73.52	shoe creme
				15.70	deluxe white creme
		1.16	storage tank	41.31	liquids
				46.13	scuffs
				8.55	leather dye
				4.00	heel and sole
		1.16	manufacturing tank		
			building #2	38.64	sneaker shampo
				61.36	patent and viny
2	Processing sink				
3	Line #6				
4	#6 Bottle washer				
5,6	Partial composite	52.05	line #6 washwater		
		20.55	processing sink		
		27.40	line #6 bottle washer		
					#6 use white cleanou
					#5 use black scuff

ATTACHMENT 2

DATA FROM EVAPORATION TESTS, INCLUDING CALCULATIONS (test box 1 sq. ft. surface area)

DATE	TEMP. °F.	R.H. %	EAST WIND VEL. MPH	SAMPLE #	TIME	DEPTH INCHES	Δ DEPTH INCHES	Δ DEPTH GALLONS	Δ TIME DAYS	EVAP. RATE GPD sq.ft.
5/8/79	85	54	3 - 4	1	3:12pm	1.9	- -	- -	- -	- -
				2	3:13pm	1.9	- -	- -	- -	- -
				3	3:14pm	2.2	- -	- -	- -	- -
				4	3:14pm	1.6	- -	- -	- -	- -
				5	3:15pm	1.1	- -	- -	- -	- -
				6	3:16pm	2.1	- -	- -	- -	- -
5/9/79	69	77	3 - 4	1	8:16am	1 1/8	0.775	0.483	0.711	0.679
				2	8:16am	1 1/4	0.650	0.405	0.710	0.570
				3	8:16am	1	1.200	0.748	0.710	1.054
				4	8:16am	7/8	0.725	0.452	0.710	0.637
				5	8:16am	1/2	0.600	0.374	0.709	0.528
				6	8:17am	1	1.100	0.686	0.709	0.967
5/9/79	84	45	3 - 4	1	1:21pm	1 1/8	0	0	0.212	0
				2	1:21pm	1 3/8	0.125	0.078	0.212	0.368
				3	1:22pm	7/8	0.125	0.078	0.213	0.367
				4	1:22pm	3/4	0.125	0.078	0.213	0.367
				5	1:22pm	nil	0.500	0.312	0.213	1.468
				6	1:23pm	1	0	0	0.213	0
5/9/79	89	34	3 - 4	1	4:37pm	15/16	0.1875	0.117	0.136	0.859
				2	4:38pm	1	0.375	0.234	0.137	1.709
				3	4:37pm	5/8	0.250	0.156	0.135	1.151
				4	4:38pm	1/4	0.500	0.312	0.136	2.290
				5	4:38pm	nil	- -	- -	- -	- -
				6	4:38pm	15/16	0.0625	0.039	0.135	0.288
OVERALL	75	65	3 - 4	1	- -	- -	0.9625	0.6000	1.0590	0.5666
AVERAGE	(from	(from		2	- -	- -	0.9000	0.5611	1.0590	0.5298
	chart)	chart)		3	- -	- -	1.5750	0.9819	1.0576	0.9284
				4	- -	- -	1.3500	0.8416	1.0583	0.7952
				5	- -	- -	1.1000	0.6858	0.9215	0.7442
				6	- -	- -	1.1625	0.7247	1.0569	0.6857

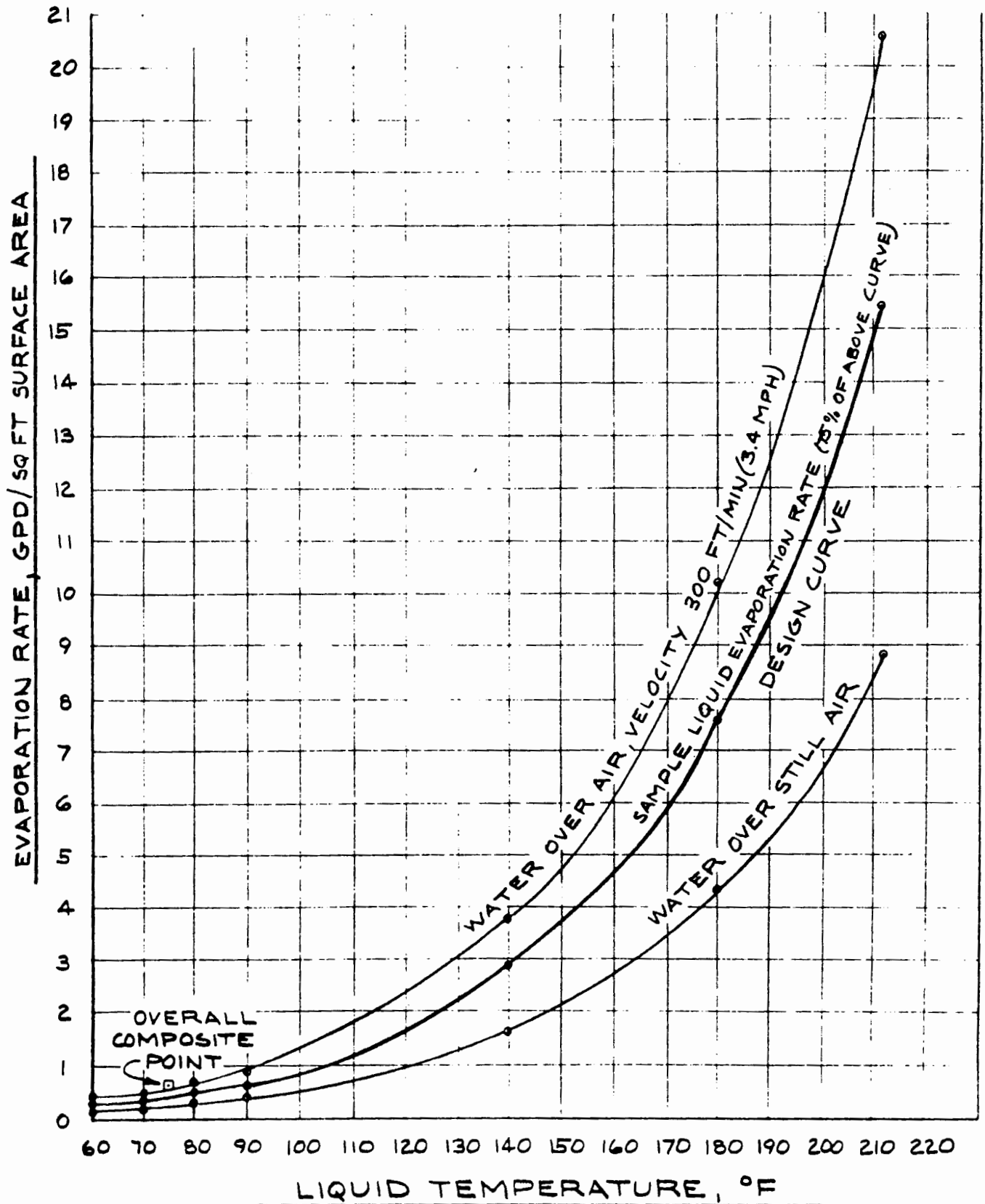
ATTACHMENT 3

ESTIMATED EVAPORATION RATES FOR WATER
AT VARIOUS TEMPERATURES
(in GPD/sq. ft. surface area)

Water temp.	60F	70F	80F	90F	140F	180F	212F
Still air	0.12	0.20	0.26	0.35	1.61	4.30	8.85
Vel. 300 fpm (approx. 3.4 mph)	0.35	0.49	0.66	0.90	3.74	10.17	20.56

ATTACHMENT 4

ESTIMATED EVAPORATION RATES AT VARIOUS LIQUID TEMPERATURE



ATTACHMENT 5

CALCULATIONS

TABLE 1

Flow 800 GPD, 60F 0.65% solids (44 PPD solids, 6624 PPD water)
1 day = 24 hours steam source @15 psig, sat., 250F, 945.6 btu/#

water temp., °F	60	70	80	90	140	180	212
evap. rate, with factor of safety GPD	0.26	0.36	0.49	0.67	2.80	7.62	15.42
approx. surface area needed, sq.ft.	3080	2225	1635	1195	290	105	55
volume of container, cu.ft. @2' depth	6160	4450	3270	2390	580	210	110
@3' depth	9240	6675	4905	3585	870	315	165
@4' depth	12320	8900	6540	4780	1160	420	220
volume of container, gal. @2' depth	46080	33290	24460	17880	4340	1570	820
@3' depth	69125	49935	36695	26820	6510	2355	1235
@4' depth	92165	66580	48925	35760	8680	3140	1645
days of storage (no evap.) @2' depth	57.6	41.6	30.5	22.3	5.4	1.9	1.0
@3' depth	86.4	62.4	45.8	33.5	8.1	2.9	1.5
@4' depth	115.2	83.2	61.1	44.7	10.8	3.9	2.0
sensible heat (wastewater at 60F)btu/day	0	66240	132480	198720	529920	794880	1006848
latent heat, btu/#	1060	1053	1048	1043	1014	990	970
latent heat, btu/day (millions)	7.0214	6.9751	6.9420	6.9088	6.7167	6.5578	6.4253
total heat, btu/day (millions)	7.0214	7.0413	7.0744	7.1076	7.2467	7.3526	7.4321
steam consumption, #/day (no heat loss)	7425	7446	7481	7516	7664	7776	7860
(no solar heat)							
steam costs, \$/day @\$2.50/1000 #steam	18.56	18.62	18.70	18.79	19.16	19.44	19.65
@\$2.60/1000 #steam	19.31	19.36	19.45	19.54	19.93	20.22	20.44
@\$2.75/1000 #steam	20.42	20.48	20.57	20.67	21.08	21.38	21.62
@\$3.00/1000 #steam	22.28	22.34	22.44	22.55	22.99	23.33	23.58
electric heater, kw (100% efficiency)	85.7	86.0	86.4	86.8	88.5	89.8	90.7
(no solar heat)							
electric costs, \$/day @3¢/kwh	61.72	61.89	62.18	62.48	63.70	64.63	65.33
@4¢/kwh	82.29	82.52	82.91	83.30	84.93	86.17	87.10
@5¢/kwh	102.86	103.15	103.64	104.13	106.16	107.71	108.88
@6¢/kwh	123.44	123.78	124.37	124.95	127.40	129.26	130.66

ATTACHMENT 6

ESTIMATED CONSTRUCTION COSTS

All estimated construction costs listed below are for budget purposes only. Until final design has been completed and details of the design have been verified (such as pickup and ending points for the piping) more accurate cost estimates are questionable. Various options are available which will reflect altered cost estimates. For example, concrete evaporation vessels are assumed although steel vessels could also be used.

It is assumed that the costs for constructing steam heat alone and for constructing steam and solar heat combined will essentially be the same. The basic components for each of these treatment techniques are virtually identical with the primary difference being the material selection for the cover. Differences in supporting the pit cover will, for all practical purposes, equalize the installed cost of the pit cover regardless of the treatment technique employed, except if solar evaporation alone is used.

It must also be borne in mind that odor problems, if real, will be greater if the wastes are not treated on a current basis. Therefore, the odor threat is greater if solar evaporation alone is utilized, resulting in probable greater future costs for resolution of such odor problem. Such future costs are not considered herewith.

<u>Combination Treatment (Steam and Solar)</u>	<u>Dollar Amount</u>
Basin construction and installation (based on 11 days total retention)	\$ 9,000.00
Piping including regulators, insulation, trap, strainers, etc. - steam	6,000.00
Pump and piping for waste	4,000.00
Cover for pit	5,000.00
Engineering	6,000.00
TOTAL	<u>\$30,000.00</u>

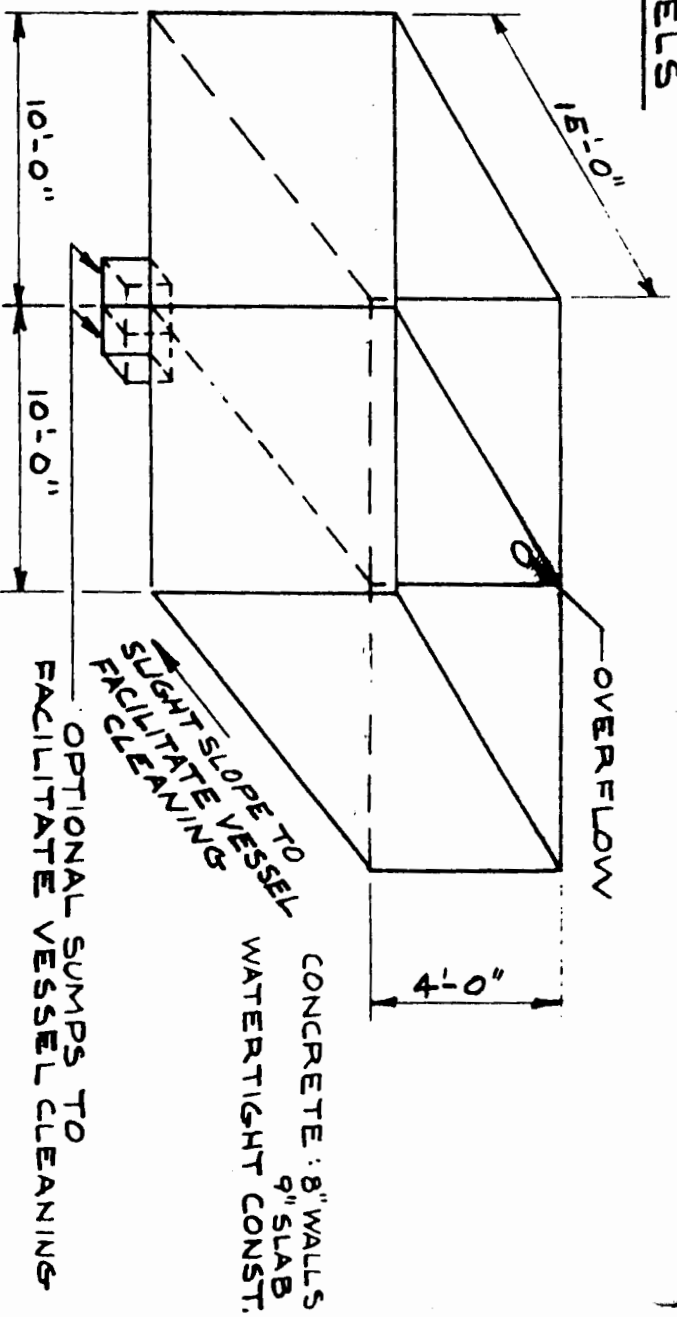
<u>Solar Heat Only</u>	
Basin construction and installation (based on 230 days total retention)	\$55,000.00
Pump and piping for waste	2,000.00
Cover for pit	33,000.00
Engineering	6,000.00
TOTAL	<u>\$96,000.00</u>

Costs Used

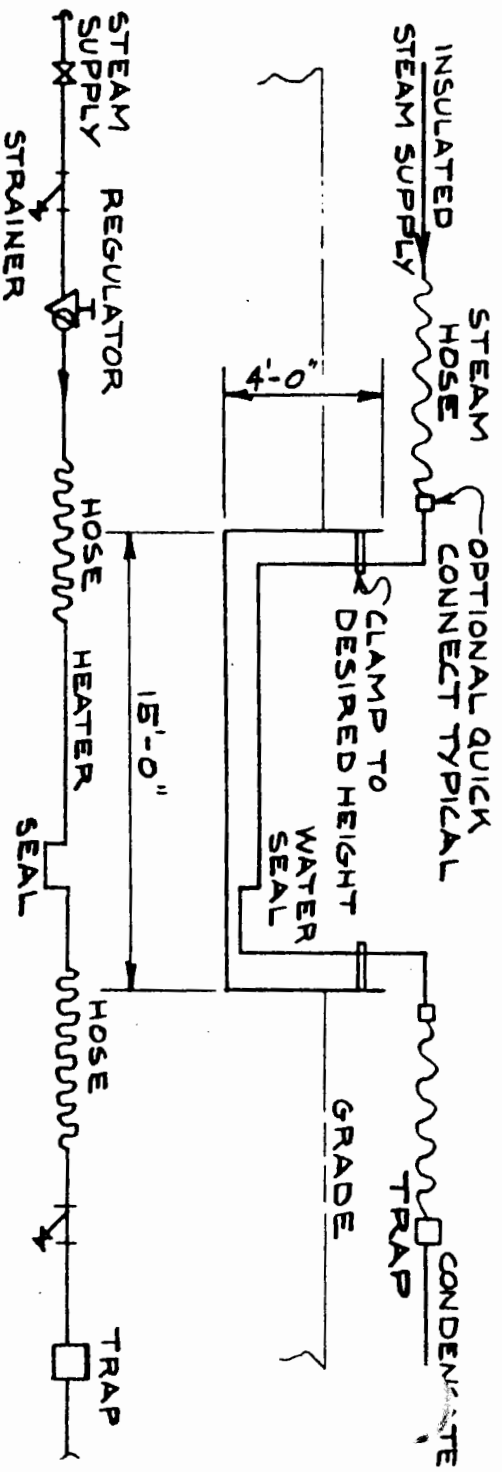
Concrete: slab \$150 per cu. yd.
 walls \$200 per cu. yd.
Excavation: \$10 per cu. yd.
Pit cover: \$5 per sq. ft.

ATTACHMENT 7 CONCEPTUAL SKETCHES COMBINATION TREATMENT SHOWN NOT TO SCALE

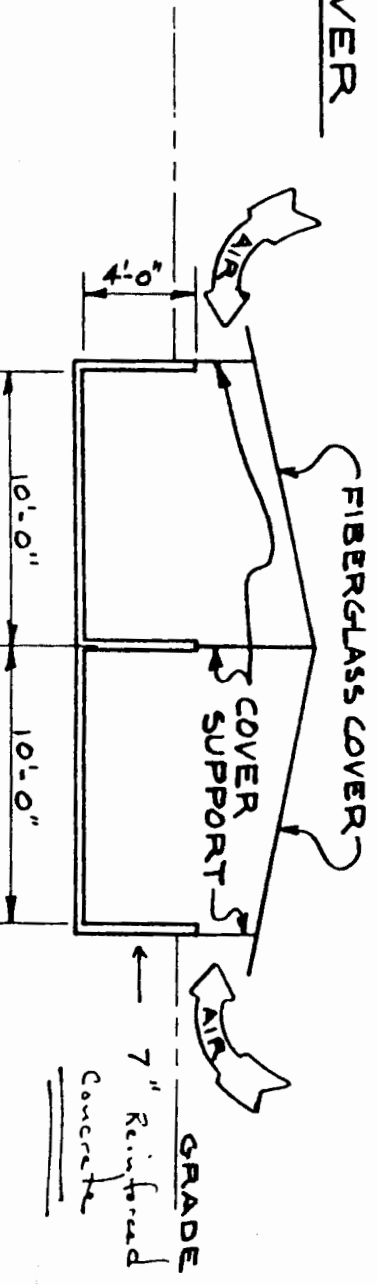
VESSELS



PIPING (STEAM ONLY SHOWN: WASTE MUST ALSO BE PIPED TO VESSELS)



COVER



VESSELS ARE SHOWN BELOW GRADE TO TAKE ADVANTAGE OF SOIL INSULATION. HOWEVER, BY RAISING THE COVER ELEVATION, THE VESSEL CAN BE LOCATED ABOVE GRADE, BUT VESSEL INSULATION IS THEN PREFERRED IF STEEL TANKS ARE SELECTED. THE METHOD OF VESSEL CLEANING MUST ALSO BE CONSIDERED IN THE DETERMINATION OF ABOVE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

October 14, 1981

Mr. W. W. Jamison
Kiwi Polish Co. - USA Division
Route 662 North
Douglassville, PA 19518

Re: EPA I.D. No. PAD 09 715 3399

Dear Mr. Jamison:

This is to acknowledge receipt of your letter dated October 2, 1981
in which you request a change to "Conditions of Operations During Interim
Status."

Enclosed is an amended form reflecting the change(s). If we can be of any
further assistance, please do not hesitate to contact Ms. Joan Henry, a
member of my staff, on 215-597-8751.

Sincerely yours,

Shirley D. Bulkin

Shirley D. Bulkin
Chief, RCPA Administrative Support Section
Permit Enforcement Branch

Enclosure

CONDITIONS OF OPERATION DURING
INTERIM STATUS

AMENDED

Date Prepared: October 14, 1981

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

I. Facility name, location, and EPA Identification Number.

Name: The Kiwi Polish Co. - USA Division

Location: Route 662 North
Douglassville, PA 19518

EPA I.D. No.: PAD 09 715 3399

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265.

Owner's Name: Kiwi Polish Co.
Attn: Mr. W. W. Jamison - Vice Pres. of Mfg.

Operator's Name:

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated.

<u>PROCESS</u>	<u>DESIGN CAPACITY</u>
<u>S02</u>	<u>9,000 Gals.</u>
<u>T01</u>	<u>800 Gals/Day</u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>
<u> </u>	<u> </u>

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid waste exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers.

<u>D009</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

8

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 • PHONE: (215) 385-3041 • CABLES: KIWI DOUGLASSVILLE • TELEX: 846384 • FAX: (215) 385-6177

9 April 1986

Mr. Thomas Voltaggio
Acting Director, Enforcement Division
U.S. Environmental Protection Agency
Region III
6th and Walnut Streets
Philadelphia, Pennsylvania 19106

REFERENCE: PAD097153399

Dear Mr. Voltaggio:

Please find enclosed a letter to the PA Department of Environmental Resources requesting delisting of our concrete evaporative tank from being a hazardous operation. In addition to the letter mentioned above, there are laboratory analyses to support this position as well as a change of notification of hazard activity as required by the D.E.R.

If you have any questions, please contact me.

Yours truly,

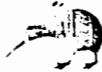
Peter A. Burke, Ph.D.
Laboratory Manager

js

cc: Commonwealth of Pennsylvania
Department of Environmental Resources
P. O. Box 2063
Harrisburg, PA 17120

Enc:

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 • PHONE: (215) 385-3041 • CABLES: KIWI DOUGLASSVILLE • TELEX: 846384 • FAX: (215) 385-6177

8 April 1986

Division of Hazardous Waste Management
Bureau of Solid Waste Management
Commonwealth of Pennsylvania
Department of Environmental Resources
P. O. Box 2063
Harrisburg, Pennsylvania 17120

REFERENCE: PAD097153399

Gentlemen:

Since our initial filing as storer/treater of hazardous waste in a concrete evaporative tank, changes in our manufacturing operation have caused the material to become non-hazardous. The only hazard associated with the original sludge was the accumulation of an organo-metallic compound which was EP toxic due to the presence of mercury. Analysis of the waste stream during the course of operation demonstrate that the waste was never EP toxic since the EP toxic leachate demonstrated less than .2 ppm. Nevertheless, we have continued to manifest the waste as hazardous as a conservative position in accordance with the RCRA regulations. Reformulation of our products has eliminated this organo-mercuric compound and, therefore, this sludge no longer constitutes EP toxic waste.

To support this position, please find enclosed copies of recent laboratory analyses of the sludge in the concrete evaporative tank demonstrating no EP toxic mercury.


In due course we hope to hear from you indicating a delisting of our facility as being a hazardous storer/treater.

Additionally, within the last year, our company name has been changed from The Kiwi Polish Company Pty. Ltd. to Kiwi Brands Inc.

Department of Environmental Resources
Page 2
8 April 1986

Thank you in advance for your cooperation.

Yours truly,



Peter A. Burke, Ph.D.
Laboratory Manager

js

cc: M. G. Maiolie
PA Department of Environmental Resources
625 Cherry Street
Reading, PA 19602

Mr. Thomas Voltaggio
Acting Director, Enforcement Division
U.S.E.P.A.
Region III
6th and Walnut Streets
Phila., PA 19106

BUREAU OF SOLID WASTE MANAGEMENT
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

ER-SWM-53: Rev. 3/82

I. INSTALLATION'S EPA I.D. NUMBER									
PA 00 9 71 5 3 39 9									
II. NAME OF INSTALLATION									
KIWI BRANDS INC.									
III. INSTALLATION MAILING ADDRESS									
STREET OR P. O. BOX									
Route 662 North									
CITY OR TOWN								ST.	ZIP CODE
Douglassville								PA	19518
IV. LOCATION OF INSTALLATION									
STREET OR ROUTE NUMBER								MUNICIPALITY	
Route 662 North								Douglassville	
CITY OR TOWN								ST.	ZIP CODE
Douglassville								PA	19518
								COUNTY	
								Berks	
V. INSTALLATION CONTACT									
NAME AND TITLE (last, first, & job title)								PHONE NO. (area code & no.)	
P. A. Burke, Laboratory Manager								215 385 304	
VI. OWNERSHIP									
A. NAME OF INSTALLATION'S LEGAL OWNER									
Kiwi Brands Inc.									
B. TYPE OF OWNERSHIP									
(enter the appropriate letter into box)									
F - FEDERAL M - NON-FEDERAL M									
VII. SIC CODES (4-digit in order of priority)									
A. FIRST					C. THIRD				
(specify) NONE					(specify) NONE				
B. SECOND					D. FOURTH				
(specify) NONE					(specify) NONE				
VIII. TYPE OF HAZARDOUS WASTE ACTIVITY									
<input type="checkbox"/> A. GENERATION		<input type="checkbox"/> C. STORE		<input type="checkbox"/> E. TRANSPORTATION (COMPLETE ITEM IX)		<input type="checkbox"/> G. REUSE, RECYCLE, RECLAIM			
<input type="checkbox"/> B. TREAT		<input type="checkbox"/> D. DISPOSE		<input type="checkbox"/> F. PERMIT BY RULE		<input checked="" type="checkbox"/> H. OTHER (specify): NONE			
IX. MODE OF TRANSPORTATION (transporters only)									
<input type="checkbox"/> A. AIR		<input type="checkbox"/> B. RAIL		<input type="checkbox"/> C. HIGHWAY		<input type="checkbox"/> D. WATER		<input type="checkbox"/> E. OTHER (specify):	
X. EXISTING ENVIRONMENTAL PROGRAM PERMITS									
A. NPDES (Discharges to Surface Water)					D. PSD (Air Emissions from Proposed Sources)				
B. UIC (Underground Injection of Fluids)					E. SOLID WASTE				
C. RCRA (Hazardous Wastes)					F. OTHER (specify)				
					NONE - Just E.P.A. ID.				
I. TYPE OF NOTIFICATION									
Mark "X" in appropriate box to indicate whether this is your installation's first notification of hazardous waste activity, or notification of a change of general information, hazardous waste handled, or hazardous waste activity. If you check B, C, D, E, or F, attach a letter of explanation (SEE INSTRUCTIONS).									
<input type="checkbox"/> A. FIRST NOTIFICATION		<input checked="" type="checkbox"/> C. DELETION OF A WASTE		<input type="checkbox"/> E. DELETION OF AN ACTIVITY					
<input checked="" type="checkbox"/> B. CHANGE OF GENERAL INFORMATION		<input type="checkbox"/> D. ADDITION OF A WASTE		<input type="checkbox"/> F. ADDITION OF AN ACTIVITY					

CERTIFICATE OF ANALYSIS

LABORATORY NO: See Below

RECEIVED: 24 Sep 1985

REPORTED: 31 Oct 1985

CLIENT: Kiwi Brands, Inc.
Route 662 North
Douglassville, PA 19518

Sample Date: 8/29/85 and 9/24/85
Sampled By: John Hughes

SAMPLE DESCRIPTION:

Parameter	Units	Total Analysis*			Units	E.P. Toxicity Leachate Analysis		
		9-24-85-N-SP RMC#2522-85	9-24-85-N RMC#2523-85	8-29-85-S RMC#2524-85		9-24-85-N-SP RMC#2522-85	9-24-85-N RMC#2523-85	8-29/85-S RMC#2524-85
Mercury, Total	mg/kg	515	0.20	0.60	mg/l	20	0.004	0.012

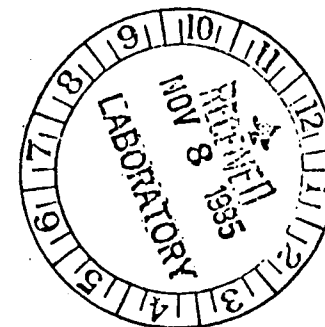
*As Received

Approved By:

Kyle F. Gross
Kyle F. Gross, Supervisor
Environmental Chemistry Laboratory

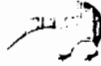
N = North Pit
S = South Pit
SP = Spiked

Sample 9-24-85-N-SP - same as 9-24-85-N only spiked
with approximately 500 ppm Hg (Troysan).



file

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 • PHONE: (215) 385-3041 • CABLES: KIWI DOUGLASSVILLE • TELEX: 846384 • FAX: (215) 385-6177

7 May 1986

Division of Hazardous Waste Management
Bureau of Solid Waste Management
Commonwealth of Pennsylvania
Department of Environmental Resources
P. O. Box 2063
Harrisburg, Pennsylvania 17120

REFERENCE: PAD097153399

Gentlemen:

In reviewing our letter of 8 April 1986 requesting a change in hazardous waste status by requesting our facility be declassified as storer of hazardous waste, we have noted than an error was committed in finalizing the Notification of Hazardous Waste Activity form.

To be specific, in description of hazardous waste, Section 12, Part A, our activities were listed as none. This is not entirely correct since we do generate some hazardous wastes which are designated by EPA code F001 and F005 as well as ignitable materials. However, these materials are not stored nor treated but are merely generated and properly disposed of within the permissible 90-day period. Therefore, would you please update our file with the enclosed Notification of Hazardous Waste Activity form which has the specific listings.

Yours truly,

Peter A. Burke, Ph.D.
Laboratory Manager

js

cc:

Mr. G. Maiolie
PA Dept. of Env. Resources
625 Cherry St.
Reading, PA 19602

Mr. Thomas Voltaggio
Acting Director
U.S.E.P.A.
Region III
6th and Walnut Streets
Phila., PA 19106

BUREAU OF SOLID WASTE MANAGEMENT
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

SWM-53: Rev. 3/82

INSTALLATION'S EPA I.D. NUMBER

A D 0 9 7 1 5 3 3 9 9

II NAME OF INSTALLATION

Kiwi Brands Inc.

III INSTALLATION MAILING ADDRESS

STREET OR P. O. BOX

Route 662 North

CITY OR TOWN

ST.

ZIP CODE

Douglassville

P A

19518

IV LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

MUNICIPALITY

Route 662 North

CITY OR TOWN

ST.

ZIP CODE

COUNTY

Douglassville

P A

19518

Berks

V INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

P.A. Burke, Laboratory Manager

2

1

5

3

8

5

3

0

4

VI OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

Kiwi Brands Inc.

B. TYPE OF OWNERSHIP

(enter the appropriate letter into box)

F - FEDERAL M - NON-FEDERAL

M

VII SIC CODES (4-digit in order of priority)

A. FIRST

C. THIRD

(specify)

None

(specify)

None

B. SECOND

D. FOURTH

(specify)

None

(specify)

None

VIII TYPE OF HAZARDOUS WASTE ACTIVITY

- ☒ A. GENERATION ☐ C. STORE ☐ E. TRANSPORTATION (COMPLETE ITEM IX) ☐ G. REUSE, RECYCLE, RECLAIM
☐ B. TREAT ☐ D. DISPOSE ☐ F. PERMIT BY RULE ☐ H. OTHER (specify):

IX MODE OF TRANSPORTATION (transporters only)

- ☐ A. AIR ☐ B. RAIL ☐ C. HIGHWAY ☐ D. WATER ☐ E. OTHER (specify):

X EXISTING ENVIRONMENTAL PROGRAM PERMITS

A. NPDES (Discharges to Surface Water)

D. PSD (Air Emissions from Proposed Sources)

B. UIC (Underground Injection of Fluids)

E. SOLID WASTE

C. RCRA (Hazardous Wastes)

F. OTHER

(specify)

None - Just EPA ID No.

XI TYPE OF NOTIFICATION

Mark "X" in appropriate box to indicate whether this is your installation's first notification of hazardous waste activity, or notification of a change in general information, hazardous waste handled, or hazardous waste activity. If you check B, C, D, E, or F, attach a letter of explanation (SEE INSTRUCTIONS).

- ☐ A. FIRST NOTIFICATION ☒ C. DELETION OF A WASTE ☐ E. DELETION OF AN ACTIVITY
☒ B. CHANGE OF GENERAL INFORMATION ☐ D. ADDITION OF A WASTE ☐ F. ADDITION OF AN ACTIVITY

CONTINUE ON REVERSE

XII DESCRIPTION OF HAZARDOUS WASTES (Continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from §75.261(h)(2) for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 00 1	F 00 5				
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from §75.261(h)(3) each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from §75.261(h)(4) for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See §75.261(g)(2) through (5))

☒ 1. IGNITABLE

☐ 2. CORROSIVE

☐ 3. REACTIVE

☐ 4. EP TOXIC

XIII CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

P.A. Burke

NAME and OFFICIAL TITLE (Type or Print)

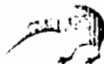
P.A. Burke
Laboratory Manager

DATE SIGNED

5/7/16

FOR OFFICIAL USE ONLY

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 • PHONE: (215) 385-3041 • CABLES: KIWI DOUGLASSVILLE • TELEX: 846384 • FAX: (215) 385-6177

4 June 1986

Mr. Samuel Israel
Hazardous Waste Management Division
U.S.E.P.A., Region III
841 Chestnut Building
Philadelphia, PA 19107

REFERENCES: Telephone Conversation on 3 June 1986
Letter from Patrick R. Anderson, received 30 May 1986

Dear Mr. Israel:

This is to confirm our conversation of 3 June 1986 concerning our requirements at Kiwi Brands Inc. to

- 1) redefine as non-hazardous under RCRA the sludge collected in our concrete evaporating tanks, and
- 2) comply with the 24 April 1986 letter from Stephen Wassersug of the EPA regarding sections 3004(u) and 3008(h) of the Hazardous and Solid Waste Amendments of 1984.

My understanding from our conversation regarding our evaporating tank sludge is that this is not a listed waste stream and, therefore, the delisting process is not pertinent. Rather, our non-listed waste stream fell under a Subpart C general characteristic; i.e., E.P. Toxicity for Mercury. We eliminated the mercurial preservative totally from our manufacturing operation about one year ago.

Your recommendation was for us to continue pursuing a redefining of our sludge as non-hazardous with the Solid Waste Department of DER, a process we initiated on 8 April 1986. We will continue to do so and, as you stated, this may require an administrative closure of the unit.

Mr. Samuel Israel
4 June 1986
Page 2

With regard to Mr. Wassersug's letter regarding the Hazardous and Solid Waste Amendments of 1984, we provided a response on 7 May 1986 which included copies of our correspondence with DER regarding the desire to change to non-hazardous status the evaporating tank sludge and was accompanied with supporting analytical data. During our conversation, you stated that our response was satisfactory and no additional information was required at this point unless we are later notified to do so.

I hope that this summary is an accurate account of where we stand regarding our present obligations as well as an indication of the future steps that Kiwi should pursue relevant to our evaporating tank sludge.

Very truly yours,

ERS

EDWARD R. STRAUCH, JR.
Senior Analytical Chemist

ERS/ep

cc: Patrick R. Anderson, Chief
Pennsylvania Section
Waste Management Branch
U.S.E.P.A., Region III
841 Chestnut Building
Philadelphia, PA 19107

M.G. Maiolie
PA Department of Environmental Resources
625 Cherry Street
Reading, PA 19602

PA
6/5/86

f

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 • PHONE: (215) 385-3041 • CABLES: KIWI DOUGLASSVILLE • TELEX: 846384 • FAX: (215) 385-6177

30 July 1986

Mr. James Dolan
Department of Environmental Resources
520 E. Broad Street
Bethlehem, PA 18018

Dear Mr. Dolan:

Pursuant to your conversation with Mr. Edward R. Strauch, our Senior Analytical Chemist, I am providing the necessary documentation for administrative closure of our evaporative concrete tanks which are no longer hazardous due to the removal of a mercurial biocide from our product line. The following steps have been taken to provide the necessary data and documentation for your review.

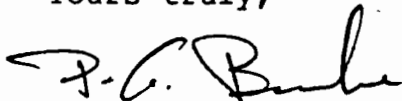
1. On 7 July 1986 Delaware Container Corporation completely removed the aqueous sludge from both the collection and evaporative tanks. During this clean-out procedure, the following actions were taken:
 - a. Both the collection and evaporative tanks were triple rinsed to insure no trace mercurial materials were adhering to the concrete or metal walls.
 - b. While the tanks were completely empty, the walls and bottoms were inspected for structural faults. No significant structural defects were sighted.
2. Three samples were taken from the third rinse specifically from the collection tank as well as the north and south side of the evaporative tanks. Provided for your review is a report from RMC Environmental Services indicating the absence of mercury. It is reported at less than .02 milligrams per liter of leachable mercury since this is the lower limits of their detection capabilities.

Mr. James Dolan
Page 2
30 July 1986

Therefore, I am requesting that you review the attached information for purposes of administrative closure and, if you require additional information prior to granting closure, please contact me.

While we are requesting administrative closure, you should be cognizant of the fact that although no hazardous materials are present in the aqueous sludge, we are still disposing of these materials through E. I. DuPont which was our practice while the sludge contained a mercury content.

Yours truly,

A handwritten signature in dark ink, appearing to read "P. A. Burke". The signature is fluid and cursive, with a large initial "P" and "B".

Peter A. Burke, Ph.D.
Laboratory Manager

js

Attach:

cc:
E. R. Strauch

CERTIFICATE OF ANALYSIS

LABORATORY NO: See below

RECEIVED: 7/8/86

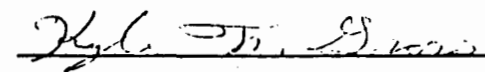
REPORTED: 7/21/86

CLIENT: KIWI
Old Swede Road
Douglassville, PA 19518

SAMPLE DESCRIPTION: EP Tox Leachate

Parameter	Units	RMC# 2045-86	RMC# 2046-86	RMC# 2047-86
		3rd Rinse South Side	3rd Rinse North Side	3rd Rinse Collection Tank
Total, Mercury	mg/l	<0.02	<0.02	<0.02

Approved By:


Kyle F. Gross
Laboratory Supervisor
Environmental Chemistry Laboratory

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 PHONE: (215) 385-3041 CABLES: KIWI DOUGLASSVILLE TELEX: 846384 FAX: (215) 385-6177

20 June 1986

Mr. Michael G. Maiolie
PA Department of Environmental Resources
625 Cherry Street
Reading, PA 19602

Dear Mr. Maiolie:

As we agreed upon during our telephone conversation on 19 June 1986, Kiwi will soon construct a third concrete evaporating tank in addition to the two existing concrete evaporating tanks and an overflow tank. This new evaporating tank will not be put into use until we have received an answer from DER concerning the administrative closure of the two existing evaporating tanks, arrangements for which are already underway.

Please contact me if you should have any comments or questions.

Very truly yours,

ERS

EDWARD R. STRAUCH, JR.
Senior Analytical Chemist

ERS/ep

PS
6/23/86

KIWI BRANDS INC.



RT. 662 NORTH, DOUGLASSVILLE, PA 19518 - PHONE: (215) 385-3041 - CABLES: KIWI DOUGLASSVILLE - TELEX: 846384 - FAX: (215) 385-6177

f.l.

21 August 1986

Mr. Michael G. Maiolie
PA Department of Environmental Resources
625 Cherry Street
Reading, PA 19602

Dear Mr. Maiolie:

As per your request during your 19 August inspection, a sample of the one-half to one inch rainwater in the overflow concrete tank at Kiwi Brands Inc. was collected and sent out for mercury analysis. Attached is a copy of the results forwarded to us on 20 August 1986 by RMC Environmental Services of Pottstown.

Should you have further questions or need additional information, please contact me.

Sincerely yours,

ERS

EDWARD R. STRAUCH, JR.
Senior Analytical Chemist

ERS/ep

Attachment



Environmental Chemistry Laboratory, Fricks Lock Rd., RD # 1, Pottstown, PA 19464 (215) 326-9662

CERTIFICATE OF ANALYSIS

LABORATORY NO: 2510-86

RECEIVED: 8/19/86

REPORTED: 8/20/86

CLIENT: KIWI
Old Swede Road
Douglassville, PA 19518

Sample Date: 8/19/86
Sampled By: Client

SAMPLE DESCRIPTION: Overflow Tank

Parameter	Units	Sample Concentration
Mercury, Total	mg/l	0.08

Approved By: Kyle F. Gross
Kyle F. Gross, Supervisor
Environmental Chemistry Laboratory



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
Reading District Office
625 Cherry Street
Reading, Pennsylvania 19602
215-378-4175

September 10, 1986

Kiwi Brands Inc.
Attention: Peter A Burke, Ph.D.
Route 662, North
Douglassville, PA 19518

Re: Closure Plan for Facility
PAD 097153399
Amity Township, Berks County

Dear Mr. Burke:

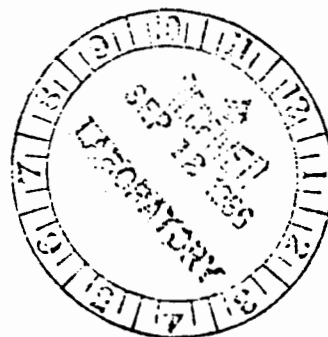
The Department received a hazardous waste closure plan for your facility on July 30, 1986, to remove a collection tank, two evaporator tanks and the overflow tank adjacent to the two evaporator tanks from the hazardous waste system. On August 19, 1986, an inspection of the above referenced units was conducted and it was determined that an additional sample should be collected from your overflow tank. This analysis dated August 21, 1986, along with the previously submitted analyses, confirm that the tanks have been adequately decontaminated.

This letter is to approve the closure plan and related closure activities which have already occurred at your facility. Once the closure certification forms have been received at this office, closure of the above referenced units will be considered complete. If you have any other questions concerning this matter, please feel free to contact me at the above number.

Very truly yours,

MICHAEL MAIOLIE
Waste Management Specialist

cc: Norristown Regional Office
Reading District Office



KIWI BRANDS INC.



RT 662 NORTH, DOUGLASSVILLE, PA 19518 • PHONE: (215) 385-3041 • CABLES: KIWI DOUGLASSVILLE • TELEX: 846384 • FAX: (215) 385-6177

18 September 1986

Mr. Michael Maiolie
Waste Management Specialist
DEPARTMENT OF ENVIRONMENTAL RESOURCES
625 Cherry Street
Reading, PA 19602

Dear Mr. Maiolie:

We have received your letter of 10 September 1986 approving our closure plan for a collection tank, two evaporator tanks, and the overflow tank adjacent to the two evaporating tanks. Enclosed are the following completed closure certification forms:

- 1) Professional Engineer Certification of Closure
- 2) Owner or Operator Certification of Closure

With the completion of these forms, it is our understanding that the administrative closure for the units is now complete.

Very truly yours,

EDWARD R. STRAUCH, JR.
Senior Analytical Chemist

ERS/ep

Enclosures

PROFESSIONAL ENGINEER CERTIFICATION OF CLOSURE

I, JOHN JOSEPH ORANSKY, a Professional Engineer registered
(Name)

pursuant to the Professional Engineers Registration Law, 63 P.S. §§148 et seq., hereby
certify that I have reviewed the Closure Plan for the STORAGE FACILITY at
(Type of Facility)

KIWI BRANDS INC. ("facility"), located
(Name of Hazardous Waste Facility)

at ROUTE 662 NORTH, DOUGLASSVILLE, PA. 19518
(Location)

that I am familiar with the rules and regulations of the Pennsylvania Department of
Environmental Resources pertaining to closure of such facility, and that I personally have
made visual inspection(s) of the aforementioned facility, and that the closure of the
aforementioned facility has been performed in full and complete accordance with the
facility's closure plan approved in writing by the Department of Environmental Resources on
September 10, 1986, and the rules and regulations of the Department
codified at 25 Pa. Code Chapter 75.

John Joseph Oransky
(Signature)

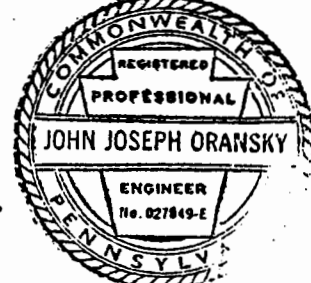
SEPT. 10, 1986

(Date)

027849-E
(Professional Engineering License Number)

SPATIS, STEVENS & MCCOY, INC.
345 N. WYOMISSING BLVD. PO BOX 6307
(Business Address)

215-376-6581
(Telephone Number)



(Seal)

OWNER OR OPERATOR CERTIFICATION OF CLOSURE

The undersigned, Kiwi Brands Inc., a (1) Corporation,
(Name of Owner or Operator)
Incorporated under the laws in the State of Pennsylvania and licensed to do business in
Pennsylvania, or (2) _____,
(Partnership, Individual, Municipality or Other Entity)
with its principal place of business at Route 662 North, Douglassville, which
(Address)
formerly owned or operated a hazardous waste storage facility
(Description of Hazardous Waste Activity)
(hereinafter "Facility") known as Kiwi Brands Inc. and
(Name of Hazardous Waste Facility)
located at Route 662 North, Douglassville
(Location)
in Berks County, Pennsylvania, has completed and permanently ceased the
active operation of the facility and has fully implemented all measures relating to the
closure of the facility as set forth in the Closure Plan approved by the Pennsylvania
Department of Environmental Resources for said facility.

NOW, THEREFORE, I (we) Kiwi Brands Inc.

(Name of Owner/Operator)

hereby swear and affirm that the above-named hazardous waste facility has been closed in
accordance with the facility's Closure Plan approved in writing by the Department on
10 September, 1986, that all measures relating to the closure of the facility required
by the Closure Plan and the rules and regulations of the Department codified at 25 Pa. Code
Chapter 75 have been fully implemented, and that to the best of my (our) knowledge, no
violations continue to exist that may have arisen prior to closure.

Anthony J. de Ferris
(Signature)

Vice President - Finance
(Title)

Route 662 North, Douglassville, PA 19518
(Address)

Taken, sworn and subscribed before me, this
15th day of September A.D. 1986

David R. Magill
(Notary)

DAVID R. MAGILL, Notary Public
Douglassville, Berks County
My Commission Expires Aug. 29, 1987



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

Bethlehem Office
520 East Broad Street
Bethlehem, PA 18018
861-2070

August 4, 1986

Re: Closure Plan for Facility
PAD097153399
Berks County

RECEIVED
AUG 6 9 13 AM '86
KIWI DOUGLASSVILLE

Mr. Peter A. Burke, Ph.D.
Laboratory Manager
Kiwi Brands Inc.
Route 662 North
Douglassville, PA 19518

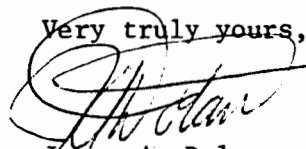
cc: ERS - Call
M. Maiolie for direction.
JAD
8/2/86

Dear Dr. Burke:

This is to acknowledge receipt of your closure plan dated July 30, 1986 for the referenced facility. Since closures for facilities that are classified as "generator only" do not require public notification, it is the responsibility of the Waste Management Specialist, who inspects your facility, to review and follow through on these closures. Therefore, Michael Maiolie of our Reading District Office will be your contact for this closure and all activity and correspondence may be directed through him. Mr. Maiolie can be contacted at (215) 378-4175.

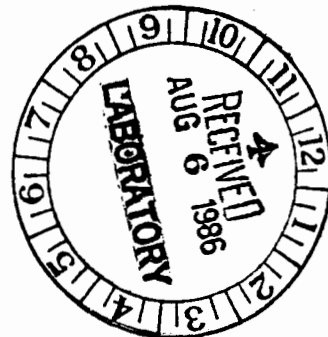
When your plan has been approved and all closure activities have been completed, please execute the enclosed closure certification forms and forward them to Mr. Maiolie. If you have any other questions or if I may be of further service, please do not hesitate to call.

Very truly yours,


James A. Dolan
Waste Management Specialist

JAD/bas

CC: Division of Facilities Management
B. Beitler
M. Maiolie



OWNER OR OPERATOR CERTIFICATION OF CLOSURE

The undersigned, _____, a (1) Corporation,
(Name of Owner or Operator)
Incorporated under the laws in the State of _____ and licensed to do business in
Pennsylvania, or (2) _____,
(Partnership, Individual, Municipality or Other Entity)
with its principal place of business at _____, which
(Address)
formerly owned or operated a hazardous waste _____
(Description of Hazardous Waste Activity)
(hereinafter "Facility") known as _____ and
(Name of Hazardous Waste Facility)
located at _____
(Location)

In _____ County, Pennsylvania, has completed and permanently ceased the
active operation of the facility and has fully implemented all measures relating to the
closure of the facility as set forth in the Closure Plan approved by the Pennsylvania
Department of Environmental Resources for said facility.

NOW, THEREFORE, I (we) _____
(Name of Owner/Operator)

hereby swear and affirm that the above-named hazardous waste facility has been closed in
accordance with the facility's Closure Plan approved in writing by the Department on
_____, 19____, that all measures relating to the closure of the facility required
by the Closure Plan and the rules and regulations of the Department codified at 25 Pa. Code
Chapter 75 have been fully implemented, and that to the best of my (our) knowledge, no
violations continue to exist that may have arisen prior to closure.

(Signature)

(Title)

(Address)

Taken, sworn and subscribed before me, this
_____ day of _____ A.D. 19____

(Notary)

OWNER OR OPERATOR CERTIFICATION OF CLOSURE

The undersigned, _____, a (1) Corporation,
(Name of Owner or Operator)
incorporated under the laws in the State of _____ and licensed to do business in
Pennsylvania, or (2) _____,
(Partnership, Individual, Municipality or Other Entity)
with its principal place of business at _____, which
(Address)
formerly owned or operated a hazardous waste _____
(Description of Hazardous Waste Activity)
(hereinafter "Facility") known as _____ and
(Name of Hazardous Waste Facility)
located at _____
(Location)
in _____ County, Pennsylvania, has completed and permanently ceased the
active operation of the facility and has fully implemented all measures relating to the
closure of the facility as set forth in the Closure Plan approved by the Pennsylvania
Department of Environmental Resources for said facility.

NOW, THEREFORE, I (we) _____
(Name of Owner/Operator)

hereby swear and affirm that the above-named hazardous waste facility has been closed in
accordance with the facility's Closure Plan approved in writing by the Department on
_____, 19____, that all measures relating to the closure of the facility required
by the Closure Plan and the rules and regulations of the Department codified at 25 Pa. Code
Chapter 75 have been fully implemented, and that to the best of my (our) knowledge, no
violations continue to exist that may have arisen prior to closure.

(Signature)

(Title)

(Address)

Taken, sworn and subscribed before me, this
_____ day of _____ A.D. 19____

(Notary)

PROFESSIONAL ENGINEER CERTIFICATION OF CLOSURE

I, _____, a Professional Engineer registered
(Name)

pursuant to the Professional Engineers Registration Law, 63 P.S. §§148 et seq., hereby
certify that I have reviewed the Closure Plan for the _____ at

(Type of Facility)

("facility"), located

(Name of Hazardous Waste Facility)

at

(Location)

that I am familiar with the rules and regulations of the Pennsylvania Department of
Environmental Resources pertaining to closure of such facility, and that I personally have
made visual inspection(s) of the aforementioned facility, and that the closure of the
aforementioned facility has been performed in full and complete accordance with the
facility's closure plan approved in writing by the Department of Environmental Resources on
_____, 19____, and the rules and regulations of the Department
codified at 25 Pa. Code Chapter 75.

(Signature)

(Date)

(Professional Engineering License Number)

(Business Address)

(Seal)

(Telephone Number)

PROFESSIONAL ENGINEER CERTIFICATION OF CLOSURE

I, _____, a Professional Engineer registered
(Name)

pursuant to the Professional Engineers Registration Law, 63 P.S. §§148 et seq., hereby
certify that I have reviewed the Closure Plan for the _____ at

(Type of Facility)

("facility"), located

(Name of Hazardous Waste Facility)

at

(Location)

that I am familiar with the rules and regulations of the Pennsylvania Department of
Environmental Resources pertaining to closure of such facility, and that I personally have
made visual inspection(s) of the aforementioned facility, and that the closure of the
aforementioned facility has been performed in full and complete accordance with the
facility's closure plan approved in writing by the Department of Environmental Resources on
_____, 19____, and the rules and regulations of the Department
codified at 25 Pa. Code Chapter 75.

(Signature)

(Date)

(Professional Engineering License Number)

(Business Address)

(Seal)

(Telephone Number)

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

RECEIVED

JUN 19 1997

KIWI BRAND
ENVIRONMENTAL AFFAIRS

Date of Inspection 6-12-97 Time start _____ Time finish _____
Name of Inspector Susan M. Werner
Company, installation name Kiwi Brands Inc.
Location 447 Old Swede Road
County Berks Municipality Amity Twp
Identification number PA0 097153399
Name of responsible official Mike Mellinger ~~Environmental Affairs Manager~~
Title Environmental Affairs Manager
Mailing Address 447 Old Swede Road Douglassville PA 19518-1239
Area code and telephone number 610 385 3041
Name of person interviewed Mike Mellinger
Title Environmental Affairs Manager
Mailing address (if different from above) Same
Area code and telephone number Same

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. 5139.9 kg./mo.
b. 61643.4 kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
0001, 0006, 0007, 0019 0029 0022 F002	ENSCO GAD 000222083	Dalton, GA Disposal, Blending
F003 F005 U226		

4. Source Reduction: ☒ accomplished, ☒ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART B

Site Name Kiwi Brands Inc. ID Number PAD 097 153399 Date 06-12-97

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
1				Hazardous waste determination, performed on all waste streams	262.11	H001
1				Identification number	262.12	H002
1				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
	2			Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
	2			PA manifest used for intrastate shipments	262.20(b)	H005
1				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
1				Manifests filled out properly and completely	262.20(g)	H007
1				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
		3		Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
		3		Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
1				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
1				Placards offered to transporter	262.33	H012
1				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
1				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
1				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
1				a). All containers of haz. waste in good condition	265.171	H016
1				b). Containers compatible with hazardous waste being stored within	265.172	H017
1				c). Containers of hazardous waste kept closed	265.173(a)	H018
1				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
1				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
1				f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
1				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
				h). Proper containment and collection system(s)	265.178	H023
1				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
1				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

Hazardous Waste Inspection Report

Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE IT
1	2	3	4			
1				Records retained at designated location for 20 years	262.40(a)	H026
	2			Quarterly reports submitted to the Department	262.41(a)	H027
1				Exception reporting procedures followed	262.42	H028
	2			Hazardous waste disposal plan, if required	262.45	H029
1				Spill reporting procedures followed	262.46(a)	H030
1				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
	2			Special requirements followed for international shipments	262.50, .53, .55, .60	H032
1				Source reduction strategy prepared and available	262.80	H033

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection: June 12, 1997

Identification Number: PAD097153399

Company/Facility/Site Name: Kiwi Brands, Inc.

I arrived on-site and met with Mr. Mike Mellinger. We proceeded on an inspection of the hazardous and residual waste generation and storage areas.

38 drums of hazardous waste and 29 drums of residual waste were observed in the main drum storage area. This area has been upgraded since the last inspection. During the last inspection, cracks were observed in the floor near the drums. Since then, the cracks have been filled and the floor painted with a sealant. Steel sealed curbing has been installed all around the storage area with soft dikes at the access points for tow motors to get in and out.

All the drums in the storage area were properly labelled and all labels were visible for inspection.

There were 8 drums of hazardous waste in the aerosol waste storage area. These drums were also properly labelled and visible.

The facility has three pits behind the building which are used to evaporate liquid waste from the production lines. This waste is non-hazardous and the sludge is removed to ENSCO in GA.

The facility also has a compactor dumpster for the plant trash. This dumpster is taken to Pottstown Landfill as a residual waste.

The facility is now placing all hazardous wastes into drums which are painted black with a white stripe around the middle. This is so these drums can be easily identified.

3 full drums of flammable waste were observed in the flammables room and 1 partial drum being filled. All the drums were closed and properly labelled.

After completing the inspection of the facility, we returned to the office to review the records.

In the "Requirement" Section of this inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (Signature) Michael V. Mellinger Date 6-19-97
Inspector (Signature) Susan M. Kerner Date 6-19-97

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection: June 12, 1997
Company/Facility/Site Name: Kiwi Brands, Inc.
Hazardous Waste Biennial Report

Identification Number: PAD097153399

The 1996 Biennial Report contains information about wastes generated in 1995. During 1995, the facility generated 136232 pounds of hazardous waste or 61643.4 kilograms. This works out to 5136.9 kilograms per month making the facility a large quantity generator.

Storage Area Inspection Logs

The storage areas are inspected on a daily basis and the log is filled out once a week. These logs were reviewed for the period of January 1997 to present.

Preparedness, Prevention, and Contingency Plan

This plan was updated on January of 1997 and includes all personnel changes.

Source Reduction Strategies

The SRS were written in 1992 and 1994. The facility is planning to update them after July 1, 1997.

Manifests

Manifests were reviewed for the period of January 1997 to present. During this period all waste shipped where
en to ENSCO in GA.

Employee Training

Employee training was conducted in December of 1996 and is planned again in December of 1997. All employees who handle hazardous wastes were trained.

In the "Requirement" Section of this Inspection report, each listed inspection item may provide only a brief version of its corresponding obligation as described in the body of the regulations. Please use the Chapter citations listed on this inspection report as a reference to obtain a detailed description of compliance requirements.

This inspection report is official notification that a representative of the Department of Environmental Protection, Waste Management Program, inspected the above installation. The findings of this inspection are shown in this report. This inspection report shall serve a formal notification of any violations which were observed during the inspection. Violations may also be discovered upon examination of the results of laboratory analyses and review of Department records. Additional notification may be forthcoming, concerning any violations indicated herein and listing any additional violations.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

on Interviewed (Signature) Michael D. Mellinger Date 6-19-97
Inspector (Signature) Susan M. Werner Date 6-19-97



KIWI BRANDS
Division of Sara Lee Corporation

447 OLD SWEDE ROAD, DOUGLASSVILLE, PA 19518-1239 • PHONE: (610) 385-3041 • FAX: (610) 385-6177

30 January 1998

PA DEP
Bureau of Land Recycling and Waste Management
P.O. Box 8550
Harrisburg, PA 17105-8550

RE: 1997 HAZARDOUS WASTE REPORT

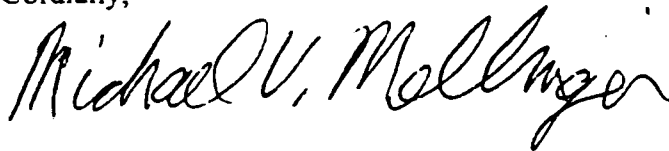
Dear PA DEP:

Enclosed please find the 1997 Hazardous Waste Report for Kiwi Brands. The individual reports included are:

- Form IC - one form
- Form GM - seven forms (HW-2, HW-4, HW-5, HW-6, HW-11, HW-12, HW-13)

If you require additional information or have any questions, please contact me at 610-385-9246.

Cordially,



Michael V. Mellinger, Ph.D., REM
Environmental Affairs Manager

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: KIWI BRANDS

EPA ID NO: P A D 0 9 7 1 5 3 3 9 9



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1997 Hazardous Waste Report

FORM
IC

IDENTIFICATION AND
CERTIFICATION

Instructions: Please see the detailed instructions beginning on page 7 of the instructions and forms booklet before completing this form. In addition, the page number for instructions specific to each section is provided below.

Sec. I Site name and location address. Check the box ☐ in items A, B, C, E, F, G, and H if same as label; if different, enter corrections. If label is absent, enter information. Instructions page 7.

A. EPA ID No. Same as label <input type="checkbox"/> or <u>P A D 0 9 7 1 5 3 3 9 9</u>		B. County Same as label <input type="checkbox"/> or <u>Berks</u>
C. Site/company name Same as label <input type="checkbox"/> or <u>Kiwi Brands</u>		D. Has the site name associated with this EPA ID changed since 1995? <input type="checkbox"/> 1 Yes <input checked="" type="checkbox"/> 2 No
E. Street name and number. If not applicable, enter industrial park, building name, or other physical location description. Same as label <input type="checkbox"/> or <u>447 Old Swede Road</u>		

F. City, town, village Same as label <input type="checkbox"/> or <u>Douglassville</u>	G. State Same as label <input type="checkbox"/> or <u>P A</u>	H. Zip Code Same as label <input type="checkbox"/> or <u>1 9 5 1 8 - 1 2 3 9</u>
--	--	---

Sec. II Mailing address of site. Instructions page 7.

A. Is the mailing address the same as the location address? ☒ 1 Yes (SKIP TO SEC. III) ☐ 2 No (CONTINUE TO BOX B)

B. Number and street name of mailing address

C. City, town, village	D. State <u>PA</u>	E. Zip Code <u>1 9 5 1 8 - 1 2 3 9</u>
------------------------	-----------------------	---

Sec. III Name, title, and telephone number of the person who should be contacted if questions arise regarding this report. Instructions page 7.

A. Last Name <u>Mellinger</u>	First name <u>Michael</u>	M.I. <u>V</u>	B. Title <u>Environmental Affairs Mgr</u>	C. Telephone Number <u>6 1 0 3 8 5 - 9 2 4 6</u> Extension <u> </u>
----------------------------------	------------------------------	------------------	--	--

Sec. IV I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties under Section 3008 of the Resource Conservation and Recovery Act for submitting false information, including the possibility of fine and imprisonment for knowing violations. Instructions page 8.

A. Last Name <u>Mellinger</u>	First name <u>Michael</u>	M.I. <u>V</u>	B. Title <u>Environmental Affairs Manager</u>
C. Signature <u>Michael V. Mellinger</u>			D. Date of signature <u>01 30 98</u> Month Day Year

Sec. V Generator status. Instructions begin on page 8.**A.** 1997 RCRA generator status

(CHECK ONE BOX BELOW)

- ☒ 1 LQG
☐ 2 SQG
☐ 3 CESQG
☐ 4 Non-generator (CONTINUE TO BOX B)
- } SKIP TO SEC. VI

B. Reason for not generating

(CHECK ALL THAT APPLY)

- ☐ 1 Never generated
☐ 2 Out of business
☐ 3 Only excluded or delisted waste
☐ 4 Only non-hazardous waste
☐ 5 Periodic or occasional generator
☐ 6 Waste minimization activity
☐ 7 Other (SPECIFY IN COMMENTS BOX BELOW)

Sec. VI On-site waste management status. Instructions page 10.**A.** Storage subject to RCRA permitting requirements1**B.** Treatment, disposal, or recycling subject to RCRA permitting requirements1

Comments:

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME KIWI BRANDSEPA ID NO P A D 0 9 7 1 5 3 3 9 9U.S. ENVIRONMENTAL
PROTECTION AGENCY

1997 Hazardous Waste Report

FORM
GMWASTE GENERATION
AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 11 of the instructions and forms booklet before completing this form. In addition, the page number for instructions specific to each box is provided in parentheses.

Sec. I A. Waste description (page 12) Combustible liquid from processing equipment washouts
Waste washout solvent containing mineral spirits (D001) NA 1993 PGI (HW-2)

B. EPA hazardous waste code D 0 0 1 (page 12)

C. State hazardous waste code (page 13)

D. SIC code (page 13)
2 8 4 2

E. Origin code 1 (page 13) System Type
M

F. Source code (page 14)
A 0 9

G. Point of measurement (p. 14)
1

H. Form code (page 14)
B 2 0 3

I. RCRA-radioactive mixed (page 14)
2

Sec. II A. Quantity generated in 1997 (page 15)

7 7 0 6 . 0

B. UOM 1 (page 15)
Density _____
= 1 lbs/gal = 2 sq

C. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? (page 15)

☐ 1 Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
☒ 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1

On-site process system type (page 16)

M

Quantity treated, disposed, or recycled on site in 1997 (page 16)

7 7 0 6 . 0

ON-SITE PROCESS SYSTEM 2

On-site process system type (page 16)

M

Quantity treated, disposed, or recycled on site in 1997 (page 16)

7 7 0 6 . 0

Sec. III A. Was any of this waste shipped off site in 1997 for treatment, disposal, or recycling? (page 17)
☒ 1 Yes (CONTINUE TO BOX B) ☐ 2 No (FORM IS COMPLETE)

Site 1 B. EPA ID No. of facility waste was shipped to (page 17)
G A D 0 0 0 2 2 2 0 8 3

C. System type shipped to (p. 17)
M 1 4 1

D. Off-site availability code (page 17)
1

E. Total quantity shipped in 1997 (page 17)
7 7 0 6 . 0

Site 2 B. EPA ID No. of facility waste was shipped to (page 17) NA

C. System type shipped to (p. 17)
M

D. Off-site availability code (page 17)
1

E. Total quantity shipped in 1997 (page 17)
7 7 0 6 . 0

Site 3 B. EPA ID No. of facility waste was shipped to (page 17) NA

C. System type shipped to (p. 17)
M

D. Off-site availability code (page 17)
1

E. Total quantity shipped in 1997 (page 17)
7 7 0 6 . 0

Comments

Sec. III.E, Site 1 - Manifest weights were estimates; weight reported here is actual weight from disposal facility records.

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: KIWI BRANDS



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1997 Hazardous Waste Report

EPA ID NO P A D 0 9 7 1 5 3 3 9 9

FORM
GM

WASTE GENERATION
AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 11 of the instructions and forms booklet before completing this form. In addition, the page number for instructions specific to each box is provided in parentheses.

Sec. I		A. Waste description (page 12) Flammable liquid Waste solvents containing acetone, ethanol, toluene, and isopropanol (HW-4)		D001, D022, F002, F003, F005 3, UN 1993, PG II	
B. EPA hazardous waste code (page 12) <u>D 0 0 1</u> <u>D 0 2 2</u> <u>F 0 0 2</u> <u>F 0 0 3</u> <u>F 0 0 5</u>		C. State hazardous waste code (page 13) _____			
D. SIC code (page 13) <u>2 8 4 2</u>	E. Origin code (page 13) <u>1</u> System Type <u>M</u>	F. Source code (page 14) <u>A 9 4</u>	G. Point of measurement (p. 14) <u>1</u>	H. Form code (page 14) <u>B 2 0 4</u>	I. RCRA-radioactive mixed (page 14) <u>2</u>

Sec. II		A. Quantity generated in 1997 (page 15) <u>2 8 7 2</u> <u>0</u>		B. UOM (page 15) <u>1</u> Density _____ = 1 lbs/gal = 2 sg		C. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? (page 15) = 1 Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) = 2 No (SKIP TO SEC. III)	
ON-SITE PROCESS SYSTEM 1				ON-SITE PROCESS SYSTEM 2			
On-site process system type (page 16) <u>M</u>		Quantity treated, disposed, or recycled on site in 1997 (page 16) _____		On-site process system type (page 16) <u>M</u>		Quantity treated, disposed, or recycled on site in 1997 (page 16) _____	

Sec. III		A. Was any of this waste shipped off site in 1997 for treatment, disposal, or recycling? (page 17) = 1 Yes (CONTINUE TO BOX B) = 2 No (FORM IS COMPLETE)			
Site 1	B. EPA ID No. of facility waste was shipped to (page 17) <u>G A D 0 0 0 2 2 2 0 8 3</u>	C. System type shipped to (p. 17) <u>M 1 4 1</u>	D. Off-site availability code (page 17) <u>1</u>	E. Total quantity shipped in 1997 (page 17) <u>2 8 7 2</u> <u>0</u>	
Site 2	B. EPA ID No. of facility waste was shipped to (page 17) NA _____	C. System type shipped to (p. 17) <u>M</u>	D. Off-site availability code (page 17) _____	E. Total quantity shipped in 1997 (page 17) _____	
Site 3	B. EPA ID No. of facility waste was shipped to (page 17) NA _____	C. System type shipped to (p. 17) <u>M</u>	D. Off-site availability code (page 17) _____	E. Total quantity shipped in 1997 (page 17) _____	

Comments: Sec. I.F - A57, A58 also.
Sec. III.E, Site 1 - Manifest weights were estimates; weight reported here is actual weight from disposal facility records.

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: KIWI BRANDSU.S. ENVIRONMENTAL
PROTECTION AGENCY

1997 Hazardous Waste Report

EPA ID NO P A D 0 9 7 1 5 3 3 9 9FORM
GMWASTE GENERATION
AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 11 of the instructions and forms booklet before completing this form. In addition, the page number for instructions specific to each box is provided in parentheses.

Sec. I		A. Waste description (page 12) D001, D039 ORM-D Waste aerosols - returned consumer products and lab samples (HW-5)	
B. EPA hazardous waste code (page 12) <u>D 0 0 1</u> <u>D 0 3 9</u>		C. State hazardous waste code (page 13) _____	
D. SIC code (page 13) <u>2 8 4 2</u>	E. Origin code (page 13) System Type <u>M</u>	F. Source code (page 14) <u>A 5 7</u>	G. Point of measurement (page 14) <u>3</u>
		H. Form code (page 14) <u>B 8 0 1</u>	I. RCRA-radioactive mixed (page 14) <u>2</u>

Sec. II	A. Quantity generated in 1997 (page 15) <u>5 6 3 3 0</u>	B. UOM (page 15) <u>1</u> Density _____ = 1 lbs/gal = 2 sq	C. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? (page 15) = 1 Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) = 2 No (SKIP TO SEC. III)
----------------	---	---	---

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site process system type (page 16) <u>M</u>	Quantity treated, disposed, or recycled on site in 1997 (page 16) _____	On-site process system type (page 16) <u>M</u>	Quantity treated, disposed, or recycled on site in 1997 (page 16) _____

Sec. III	A. Was any of this waste shipped off site in 1997 for treatment, disposal, or recycling? (page 17) = 1 Yes (CONTINUE TO BOX B) = 2 No (FORM IS COMPLETE)			
Site 1	B. EPA ID No. of facility waste was shipped to (page 17) <u>G A D 0 0 0 2 2 2 0 8 3</u>	C. System type shipped to (p. 17) <u>M 1 4 1</u>	D. Off-site availability code (page 17) <u>1</u>	E. Total quantity shipped in 1997 (page 17) <u>5 6 3 3 0</u>
Site 2	B. EPA ID No. of facility waste was shipped to (page 17) NA _____	C. System type shipped to (p. 17) <u>M</u>	D. Off-site availability code (page 17) _____	E. Total quantity shipped in 1997 (page 17) _____
Site 3	B. EPA ID No. of facility waste was shipped to (page 17) NA _____	C. System type shipped to (p. 17) <u>M</u>	D. Off-site availability code (page 17) _____	E. Total quantity shipped in 1997 (page 17) _____

Comments: Sec. I.F - A58 also.
 Sec. I.H - Contains aerosol cans
 Sec. III.E, Site 1 - Manifest weights were estimates; weight reported here is actual weight from disposal facility records.

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: KIWI BRANDSU.S. ENVIRONMENTAL
PROTECTION AGENCY

1997 Hazardous Waste Report

EPA ID NO PAD 091153399FORM
GMWASTE GENERATION
AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 11 of the instructions and forms booklet before completing this form. In addition, the page number for instructions specific to each box is provided in parentheses.

Sec. I A. Waste description (page 12) <u>D001 Oxidizing Solid 5.1 UN 1479 PG II</u> <u>Waste SDID Bleach Tabs - returned consumer products & off-spec material (HW-6)</u>					
B. EPA hazardous waste code (page 12) <u>D001</u>			C. State hazardous waste code (page 13)		
D. SIC code (page 13) <u>2842</u>	E. Origin code (page 13) <u>System Type</u> <u>M</u>	F. Source code (page 14) <u>A57</u>	G. Point of measurement (p 14) <u>3</u>	H. Form code (page 14) <u>B407</u>	I. RCRA-radioactive mixed (page 14) <u>2</u>

Sec. II A. Quantity generated in 1997 (page 15) <u>840</u>	B. UOM (page 15) <u>1</u> Density <u>1</u> lbs/gal = 2 sg	C. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? (page 15) = 1 Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) = 2 No (SKIP TO SEC. III)
--	---	--

ON-SITE PROCESS SYSTEM 1		ON-SITE PROCESS SYSTEM 2	
On-site process system type (page 16) <u>M</u>	Quantity treated, disposed, or recycled on site in 1997 (page 16)	On-site process system type (page 16) <u>M</u>	Quantity treated, disposed, or recycled on site in 1997 (page 16)

Sec. III A. Was any of this waste shipped off site in 1997 for treatment, disposal, or recycling? (page 17) = 1 Yes (CONTINUE TO BOX B) = 2 No (FORM IS COMPLETE)				
Site 1	B. EPA ID No. of facility waste was shipped to (page 17) <u>GAD 000222083</u>	C. System type shipped to (p 17) <u>M141</u>	D. Off-site availability code (page 17) <u>1</u>	E. Total quantity shipped in 1997 (page 17) <u>840</u>
Site 2	B. EPA ID No. of facility waste was shipped to (page 17) <u>NA</u>	C. System type shipped to (p 17) <u>M</u>	D. Off-site availability code (page 17) <u>1</u>	E. Total quantity shipped in 1997 (page 17)
Site 3	B. EPA ID No. of facility waste was shipped to (page 17) <u>NA</u>	C. System type shipped to (p 17) <u>M</u>	D. Off-site availability code (page 17) <u>1</u>	E. Total quantity shipped in 1997 (page 17)

Comments: Sec. I.F - A58 also.
 Sec. III.E, Site 1 - Manifest weights were estimated; weight reported here is actual weight from disposal facility records.
 Sec. I.H - Contains bleach toilet bowl tablets.

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: KIWI BRANDS

EPA ID NO: PA D 09 7 1 5 3 399



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1997 Hazardous Waste Report

FORM
GM

WASTE GENERATION
AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 11 of the instructions and forms booklet before completing this form. In addition, the page number for instructions specific to each box is provided in parentheses.

Sec. I A. Waste description (page 12) Off-spec material Combustible liquid
Waste bulk polish containing mineral spirits (D001) NA1993, PG III (HW-11)

B. EPA hazardous waste code (page 12) D10101

C. State hazardous waste code (page 13)

D. SIC code (page 13)
2842

E. Origin code (page 13) 1
System Type M

F. Source code (page 14)
A57

G. Point of measurement (p. 14)
1

H. Form code (page 14)
B409

I. RCRA-radioactive mixed (page 14)
2

Sec. II A. Quantity generated in 1997 (page 15)

25449.0

B. UOM (page 15)
1
Density 1.0
1 lbs/gal 2 sg

C. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? (page 15)

1 Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1

On-site process system type (page 16)

Quantity treated, disposed, or recycled on site in 1997 (page 16)

M

1

ON-SITE PROCESS SYSTEM 2

On-site process system type (page 16)

Quantity treated, disposed, or recycled on site in 1997 (page 16)

M

1

Sec. III A. Was any of this waste shipped off site in 1997 for treatment, disposal, or recycling? (page 17)
1 Yes (CONTINUE TO BOX B) 2 No (FORM IS COMPLETE)

Site 1 B. EPA ID No. of facility waste was shipped to (page 17)
GAD 000 222 083

C. System type shipped to (p. 17)
M 141

D. Off-site availability code (page 17)
1

E. Total quantity shipped in 1997 (page 17)
25449.0

Site 2 B. EPA ID No. of facility waste was shipped to (page 17) NA

C. System type shipped to (p. 17)
M

D. Off-site availability code (page 17)
1

E. Total quantity shipped in 1997 (page 17)
1

Site 3 B. EPA ID No. of facility waste was shipped to (page 17) NA

C. System type shipped to (p. 17)
M

D. Off-site availability code (page 17)
1

E. Total quantity shipped in 1997 (page 17)
1

Comments: Sec. I.H - Bulk shoe polish

Sec. III.E, Site 1 - Manifest weights were estimates, weight reported here is actual weight from disposal facility records.

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME: KIWI BRANDS

EPA ID NO: PA D 0917153 399



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1997 Hazardous Waste Report

FORM
GM

WASTE GENERATION
AND MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 11 of the instructions and forms booklet before completing this form. In addition, the page number for instructions specific to each box is provided in parentheses.

Sec. I A. Waste description (page 12) D001 Oxidizing Solid 5.1 UN 1479 PG II
Waste BCDMH Bleach Tabs - returned consumer products & off-spec material (HW-13)

B. EPA hazardous waste code (page 12) 0001

C. State hazardous waste code (page 13)

D. SIC code (page 13) 2842

E. Origin code (page 13) 1
System Type M

F. Source code (page 14) A57

G. Point of measurement (p. 14) 3

H. Form code (page 14) B407

I. RCRA-radioactive mixed (page 14) 2

Sec. II A. Quantity generated in 1997 (page 15)

1800

B. UOM (page 15) 1

Density 1
= 1 lbs/gal = 2 sg

C. Did this site do any of the following to this waste: treat on site, dispose on site, recycle on site, or discharge to a sewer/POTW? (page 15)

☐ 1 Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1)
☒ 2 No (SKIP TO SEC. III)

ON-SITE PROCESS SYSTEM 1

On-site process system type (page 16)

M

Quantity treated, disposed, or recycled on site in 1997 (page 16)

1800

ON-SITE PROCESS SYSTEM 2

On-site process system type (page 16)

M

Quantity treated, disposed, or recycled on site in 1997 (page 16)

1800

Sec. III A. Was any of this waste shipped off site in 1997 for treatment, disposal, or recycling? (page 17)
☒ 1 Yes (CONTINUE TO BOX B) ☐ 2 No (FORM IS COMPLETE)

Site 1 B. EPA ID No. of facility waste was shipped to (page 17) PA D 0917153 399

C. System type shipped to (p. 17) M141

D. Off-site availability code (page 17) 1

E. Total quantity shipped in 1997 (page 17) 1800

Site 2 B. EPA ID No. of facility waste was shipped to (page 17) NA

C. System type shipped to (p. 17) M

D. Off-site availability code (page 17) 1

E. Total quantity shipped in 1997 (page 17) 1800

Site 3 B. EPA ID No. of facility waste was shipped to (page 17) NA

C. System type shipped to (p. 17) M

D. Off-site availability code (page 17) 1

E. Total quantity shipped in 1997 (page 17) 1800

Comments:

Sec. I.F - A58 also.

Sec. III.E, Site 1 - Manifest weights were estimated; weight reported here is actual weight from disposal facility records.

Sec. I.H - Contains bleach toilet bowl tablets.



Pt. 6



KIWI BRANDS

Division of Sara Lee Corporation

447 OLD SWEDE ROAD, DOUGLASSVILLE, PA 19518-1239 • PHONE: (610) 385-3041 • FAX: (610) 385-6177

11 May 1999

Ms. Hilary Livingston, Project Manager
Pennsylvania Operations Branch
USEPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

RE: Corrections to "ENVIRONMENTAL INDICATOR INSPECTION REPORT" dated December 1, 1998 prepared by USACOE

Dear Ms. Livingston:

As we discussed on 10 May 1999 there are incorrect combinations of facts in the above report in the section titled "Meeting Summary, B. Description of all Solid Waste Management Units (SWMUs) and/or Areas of Concern (AOCs) as well as description of known and/or potential releases. Past hazardous material releases at the site include the following:" starting on page 2. Information from one release was incorrectly associated with another release. I have written the correct passages below.

- January 29, 1988 - Approximately 700 gallons of mineral spirits released (refer to Figure 4). During a bulk delivery of mineral spirits to an underground storage tank, a faulty tank level indicator caused a tank overflow. Cleanup operations were immediately undertaken, and included collection of any recoverable mineral spirits, excavation of approximately 120 tons of contaminated soil and installation of three recovery wells. The contaminated soil was properly disposed as verified by the disposal manifest. In a letter dated September 20, 1989 from Mr. Edward Strauch, Jr., Manager, Analytical & Environmental Affairs at Kiwi Brands to Mr. Michael Maiolic of PADEP "Well testing was performed every six months to monitor the residual solvent level." The results from sampling on July 28, 1989 verified that the solvent level was less than the analytical detection limit.

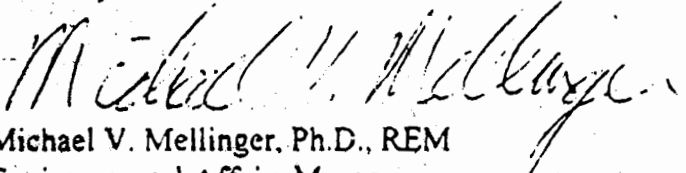
- September 13, 1994 - Approximately 115 gallons of mineral spirits released (refer to Figure 4). A tanker delivering mineral spirits accidentally released mineral spirits to the ground near the tank pumphouse due to a valve not being closed before a pump was activated. Immediate containment was accomplished. Contaminated soil and asphalt were excavated and sent offsite for disposal. The excavated area was refilled with clean soil. In a letter from Dr. Mellinger to Ms. Susan Kinkaid of PADEP dated November 23, 1994 Kiwi presented a "Certificate of Soil Remediation" from Soil Remediation of Philadelphia, Inc. confirming that the soil contaminated by the release was properly disposed.

NOTE: Figure 4 should also be amended by adding the September 1994 release information into the box for Mineral Spirits Releases (but not from former UST's since the UST's had been removed before this release.

The last two sentences in the current version of the report for the January 29, 1888 release starting with "In late 1993, Kiwi removed the UST..." are not part of the information for this release. The information actually refers to work Kiwi Brands did in connection with removing our mineral spirits UST's and replacing them with AST's.

I hope this explanation will help to clarify the releases and related information for our site. If you have any questions or need additional information, please contact me at 610-385-9246.

Cordially,



Michael V. Mellinger, Ph.D., REM
Environmental Affairs Manager